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**Supplementary Information  
Package (SIP) to the ESIA of the  
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Volume IV - Appendices 9.14 to 9.17**

COMPAGNIE DES BAUXITES DE GUINÉE

OCTOBER 1, 2015

**PROJECT NUMBER: 15OTH076**

PREPARED FOR:

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Compagnie des Bauxites de Guinée

## APPENDICES

### **Appendix 9.14 Resettlement and Livelihoods Restoration Policy Framework**





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# **Resettlement and Livelihoods Restoration Policy Framework**

COMPAGNIE DES BAUXITES DE GUINÉE  
SEPTEMBER 11, 2015

SECOND RELEASE WITH REVISIONS  
OCTOBER 1 AND 5, 2015

PROJECT NUMBER: 15OTH076

# TABLE OF CONTENTS

<b>1 INTRODUCTION.....</b>	<b>1</b>
1.1 PURPOSE AND SCOPE .....	1
1.2 CBG EXPANSION PROJECT .....	2
1.3 DESCRIPTION OF PREVIOUS APPROACH TO RESETTLEMENT .....	5
<b>2 IMPACTS .....</b>	<b>6</b>
2.1 IMPACT TYPES .....	6
2.1.1 Vulnerable People .....	7
2.2 IMPACT SOURCES .....	7
2.2.1 Mining Area .....	7
2.2.2 Rail-corridor .....	7
2.2.3 Port Area.....	8
2.3 CURRENTLY IDENTIFIED RESETTLEMENT IMPACTS .....	8
2.3.1 Mining Area .....	8
2.4 RAIL-CORRIDOR.....	11
2.4.1 Port Area.....	12
<b>3 THE LEGAL FRAMEWORK .....</b>	<b>14</b>
3.1 THE NOTION OF PROPERTY IN GUINEA.....	14
3.1.1 Herding.....	14
3.2 CUSTOMARY LAND-TENURE .....	14
3.3 MINING LAW.....	15
3.4 INTERNATIONAL STANDARDS .....	16
3.5 GAP ASSESSMENT .....	17
<b>4 THE PUBLIC PARTICIPATION PROCESS .....</b>	<b>19</b>
4.1 CONSULTATION OF CBG PERSONNEL .....	20
4.2 CONSULTATION OF PROJECT AFFECTED PERSONS .....	21
4.2.1 Informed Consultation and Participation .....	21
4.2.1 Objectives .....	21
4.2.2 Consultation and Participation Process.....	22
4.3 PARTICIPATION OF HOST COMMUNITIES.....	23

4.4 PARTICIPATION OF OTHER STAKEHOLDERS .....	23
4.5 DOCUMENTATION OF CONSULTATION.....	24
<b>5 GRIEVANCE MANAGEMENT .....</b>	<b>24</b>
5.1 ROLES AND RESPONSIBILITIES.....	25
5.2 GRIEVANCE MANAGEMENT PROCESS .....	27
5.2.1 Reception .....	27
5.2.1 Preliminary Review .....	27
5.2.1 Grievance Treatment .....	28
5.2.1 Legal Process .....	28
5.2.1 Grievance Closure and Monitoring.....	29
5.3 GRIEVANCE TREATMENT TIMELINES .....	29
5.4 DOCUMENTATION OF GRIEVANCE MANAGEMENT.....	29
5.5 UNRESOLVED PAST GRIEVANCES .....	30
<b>6 SOCIOECONOMIC SURVEYS .....</b>	<b>30</b>
6.1.1 Identification of Vulnerable Households .....	31
<b>7 ASSET SURVEYS .....</b>	<b>32</b>
7.1 ASSET SURVEY PROCESS .....	32
7.2 CUT-OFF DATES .....	33
<b>8 ELIGIBILITY AND COMPENSATION.....</b>	<b>33</b>
8.1 KEY PRINCIPLES.....	34
8.2 ELIGIBILITY.....	35
8.2.1 Project Affected Households or Individuals .....	35
8.2.2 Groups of Affected Households .....	36
8.2.1 Affected Communities .....	36
8.3 COMPENSATION OF LOSSES .....	37
8.3.1 Typology of Losses .....	37
8.3.2 Entitlement Matrix .....	37
8.3.3 Land .....	39
8.3.4 Infrastructure .....	41
8.3.5 Cultural Heritage .....	44
8.3.6 Livelihoods .....	45

8.3.7	Land-use .....	46
8.3.8	Determination of Compensation Rates .....	47
8.3.9	Livelihoods Restoration.....	47
8.3.10	Compensation Process.....	48
8.3.11	Management of Outstanding Compensation Claims.....	49

## **9 CULTURAL HERITAGE RESOURCES..... 50**

## **10...RESETTLEMENT SITES ..... 51**

10.1	KEY OBJECTIVES .....	52
10.2	SITE SELECTION PROCESS .....	53
10.2.1	Identification of Acceptability Criteria .....	53
10.2.2	Site Identification and Evaluation .....	53
10.3	RESETTLEMENT SITE DEVELOPMENT .....	54
10.4	REGULARISATION OF LAND-TENURE .....	55
10.5	MOVES.....	55
10.6	INFLUX MANAGEMENT.....	56
10.6.1	General Influx Management .....	56
10.6.2	Influx in the Context of a Resettlement Action Plan .....	57

## **11...ENVIRONMENTAL MANAGEMENT ..... 57**

## **12...MONITORING AND EVALUATION ..... 58**

12.1	MONITORING.....	58
12.2	EVALUATION.....	62
12.2.1	Internal Evaluation.....	62
12.2.2	Completion Audit .....	63

## **13...ORGANISATIONAL RESPONSIBILITIES ..... 64**

13.1	INTERNAL RESETTLEMENT ADVISORY COMMITTEE .....	65
13.2	EXTERNAL RESETTLEMENT ADVISORY COMMITTEE .....	66
13.3	RESETTLEMENT STEERING COMMITTEE.....	66
13.3.1	Composition of the Resettlement Steering Committee.....	67
13.4	RESETTLEMENT UNIT .....	67
13.4.1	Composition of the Resettlement Unit.....	68

13.5 COMPENSATION COMMISSION .....	69
13.6 COMMUNITY RESETTLEMENT COMMITTEE .....	69
13.6.1 Community Facilitator .....	70
<b>14... RAP PROCESS.....</b>	<b>70</b>
14.1 DOCUMENTATION.....	72
<b>15... BUDGET SETTING .....</b>	<b>72</b>

## APPENDICES

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Appendix A: Appendix title

## LIST OF FIGURES

Figure 1 - Specific Resettlement Action Plans to be developed for the CBG mining concession by 2022 .....	8
Figure 2 –CBG RAP Grievance Management Process.....	27
Figure 3 – Cultural Heritage Sites in the Mining Concession.....	51
Figure 4 – Resettlement site evaluation matrix.....	54
Figure 5 – Key actors in RAP development and implementation .....	65
Figure 6 – The RAP development process .....	71

## LIST OF MAPS

Map 1 - CBG project area .....	4
Map 2 - Mine zone villages with the greatest potential impact on land and housing (27.5 MTPA in 2022) .....	10

Map 3 - Expansion Project impact on Katomou, Toumbéta and Kamakouloun  
land near KP 14..... 12

Map 4 - Expansion Project impact areas in Kamsar ..... 2-13

## **LIST OF MAPS**

Table 2 - Comparison of Guinean Law and IFC Performance Standard 5..... 18

Table 3 - Grievance Classification Grid ..... 28

Table 4 - Grievance treatment timelines..... 29

Table 5 - Entitlements Matrix for Land ..... 39

Table 6 - Entitlements Matrix for Infrastructure ..... 41

Table 7 - Entitlements Matrix for Cultural Heritage Resources ..... 44

Table 8 - Entitlements Matrix for Livelihoods..... 45

Table 9 - Entitlements Matrix for Land-Uses..... 46

Table 10 - Key socioeconomic indicators ..... 61

Table 11 - Key Elements in a RAP Budget ..... 72

# 1 INTRODUCTION

## 1.1 PURPOSE AND SCOPE

This document presents a Resettlement and Livelihoods Restoration Policy Framework (RLRPF) to manage economic and physical displacements caused by the Compagnie des bauxites de Guinée (CBG)'s bauxite production Expansion Project (the Project) in the Boké region of Guinea. This document equally applies to situations where increases in environmental hazards or disturbances caused by mine expansion require the physical displacement of populations for health and safety reasons.

An Environmental and Social Impact Assessment (ESIA) was prepared for the Project and submitted in 2015. This ESIA identified potential physical and economic displacement impacts associated with the Project. At the time of development of the ESIA, CBG's resettlement approach was one based on land-expropriation through financial compensation. The development of a formal population resettlement approach consistent with international standards was therefore identified as a priority for the CBG to strengthen its resettlement procedures and capacity.

The construction of a sorting yard and associated facilities and mining activities on the territory of two villages in its mining concession – Hamdallaye and Fassaly Foutahbe provided an initial opportunity to develop and implement this new approach. In 2014, EEM was mandated by CBG to complete a Resettlement Action Plan (RAP) for these two villages. This work was to provide a test case for the development of a new approach to managing physical and economic displacements caused by CBG's Bauxite mining, transformation and transportation activities.

As nature and extent of physical and economic displacement caused by the Project is not currently known to a sufficient level of detail, this Resettlement and Livelihoods Restoration Policy Framework has been developed. This was done in order to meet the requirements of IFC Performance Standard 5 paragraph 16:

*Where the exact nature or magnitude of the land acquisition or restrictions on land use related to a project with potential to cause physical and/ or economic displacement is unknown due to the stage of project development, the client will develop a Resettlement and/or Livelihood Restoration Framework outlining general principles compatible with this Performance Standard.*

This document will serve as a guide and policy manual for the implementation of RAPs for specific instances of involuntary resettlement and livelihoods restoration in the CBG project area. It provides an overview of the general principles and approach to be followed by CBG including:

- Resettlement impacts
- The legal framework for resettlement
- Public participation in RAP development
- Grievance management
- The process for conducting socioeconomic studies and asset surveys
- Eligibility & compensation
- Livelihoods restoration
- Resettlement sites
- Cultural heritage resources
- Environmental management
- Monitoring and evaluation
- Organisational responsibilities
- The RAP implementation process
- Budget setting

## **1.2 CBG EXPANSION PROJECT**

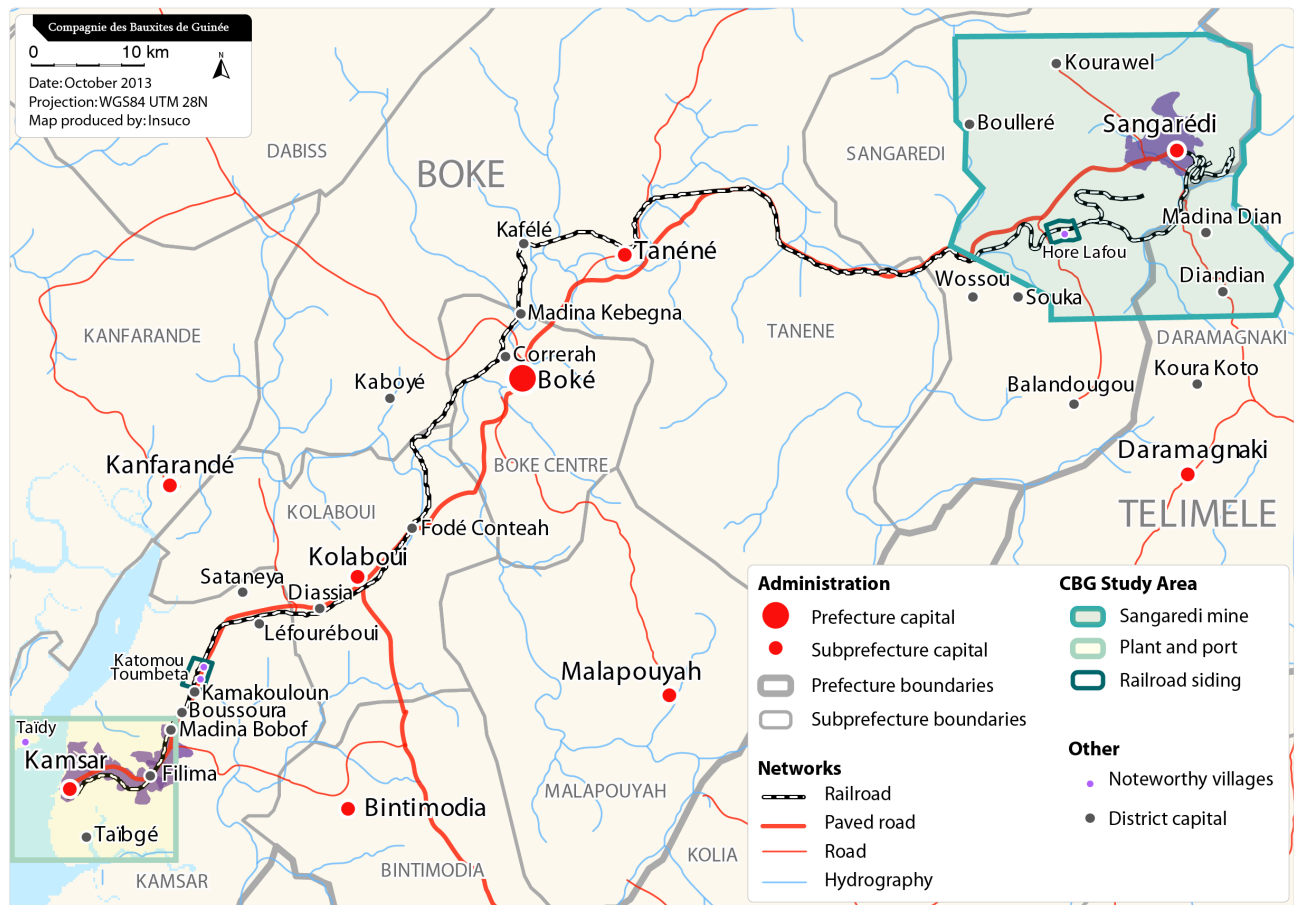
CBG is a mining company owned jointly by the Government of Guinea and Halco Mining (Alcoa, Rio Tinto Alcan and Dadco).

At present, CBG extracts, transports by rail, processes and ships some 13.5 MTPA (plant nameplate capacity) of 3% moisture content bauxite from its facilities, located in Kamsar and Sangarédi in northwestern Guinea (



Map 1). CBG was created in 1963 and its facilities have been in operation since 1973.

Map 1 - CBG Project area



(Source: ÉEM. *Environmental and Social Impact Assessment of the CBG Mine Expansion Project*)

CBG is currently considering increasing its bauxite production by 9 MTPA of shipped material, for a production capacity of 22.5 MTPA (at 3% moisture content) by the last quarter of 2017, with another 5 MTPA expansion around 2022, for a total production capacity of 27.5 MTPA. An intermediate step is planned at 18.5 MTPA.

The first scenario therefore consists in raising production to 22.5 MTPA in 2017 or later. Works and investments in this scenario include a new rail yard (Parawi), extension of the siding at PK 72, and the purchase of new railcars.

Phase I has an intermediate stage, which consists in raising production to 18.5 MTPA. A series of works and investments must be made in order to

achieve this increase in ore production, processing and shipping—such as the purchase of new rolling stock (railcars, locomotives), a new rail yard at Kamsar, extension of the existing quay (south) and dredging of part of the port.

Phase II of the Expansion Project will raise production to 27.5 MTPA by 2022. Works and investments for this phase include construction of shops at the N'Dangara mine and construction of railroad sidings at PK14 and PK118.

### **1.3 DESCRIPTION OF PREVIOUS APPROACH TO RESETTLEMENT**

CBG's previous approach to economic and physical displacement was one of land expropriation through estimation and compensation in cash for losses based on compensation rates fixed by the Guinean Government. While all compensations are documented and paid under the supervision of a bailiff representing the Guinean Government, this process does not meet the requirements of the IFC and World Bank particularly in the areas of:

- Defining eligibility criteria for compensation and establishing cut-off dates;
- Broad public participation to involve Project Affected Persons (PAP) in decision-making around resettlement and compensation;
- Identifying and involving vulnerable persons;
- Prioritising in-kind compensation over cash compensation, especially for livelihood-generating assets such as agricultural land;
- Managing grievances associated with resettlement;
- Implementing monitoring programmes to assess the effective improvement or at minimum restoration of livelihoods post resettlement;
- Management of cultural heritage resources.

As a result, the ESIA noted broad dissatisfaction amongst community stakeholders with the previous resettlement approach. Further to this, consultations carried out during the ESIA process identified concerns with previous uncompensated land expropriation as a result of CBG's activities.

While it is impossible in the context of the current document to validate these claims, CBG as a brownfield operation will undoubtedly confront prior unresolved grievances in association with future land-take.

## 2 IMPACTS

### 2.1 IMPACT TYPES

The Expansion Project and ongoing operational activities of the mine may cause involuntary resettlement involving either physical displacement (relocation or loss of shelter<sup>1</sup>) or economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood<sup>2</sup>).

- Physical displacement:
  - Expropriation of built and inhabited areas;
  - Loss of or loss of access to livelihood generating assets and resources and activities to the extent that an inhabited area is no longer viable;
- Economic displacement:
  - Loss of or loss of access to agricultural land;
  - Diminished productivity of agricultural land due to an intensification of farming on remaining land including reduction in time for regeneration of fallow lands;
  - Loss of or loss of access to common resources (i.e. pasture-land, woodland, water-sources, fishing grounds, etc.);

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<sup>1</sup> Source : IFC Performance Standard 5 Land Acquisition and Involuntary Resettlement

<sup>2</sup> Source : IFC Performance Standard 5 Land Acquisition and Involuntary Resettlement

- Loss of business revenue from non-agricultural income generating activities; and
- Other:
  - Changes to traditional land-management structures.

### **2.1.1 Vulnerable People**

The effects of physical and economic displacement are often felt disproportionately by individuals who, through socio-economic conditions, health or other factors, are less able to improve or re-establish their livelihoods subsequent to the implementation of resettlement or livelihoods restoration efforts. These people, defined as “vulnerable people” will be a source of particular focus in this document.

## **2.2 IMPACT SOURCES**

Involuntary resettlement can be caused by a number of CBG’s activities. This section details primary causes of involuntary resettlement in the three Project zones:

### **2.2.1 Mining Area**

In the mining area, potential causes of involuntary resettlement include:

- Opening of new plateaux for bauxite extraction;
- Construction of sorting yards and other associated infrastructure;
- Construction of mine haul-roads;
- Construction of rail-corridors;
- Construction of water reservoirs;
- Opening of borrow-pits and quarries; and
- Construction of worker accommodations.

### **2.2.2 Rail-corridor**

Along the rail-corridor that connects the mining region around Sangarédi with the mill and port facilities in Kamsar, potential causes of involuntary resettlement include:

- Construction of rail-sidings;

- Opening of borrow-pits and quarries.

### 2.2.3 Port Area

In the port area, the primary causes of involuntary resettlement are as follows:

- Construction of worker accommodations; and
- Opening of borrow-pits and quarries.

## 2.3 CURRENTLY IDENTIFIED RESETTLEMENT IMPACTS

### 2.3.1 Mining Area

The ESIA identified a number of villages likely to be impacted by physical or economic displacement (based on the 27.5 MTPA in 2022 scenario). The Social and Environmental Management Plan (SEMP) adopted by the CBG anticipates the development of four (4) specific RAPs in the mining concession by 2022. These are presented in Figure 1 along with the potentially affected villages and their populations.

**Figure 1 - Specific Resettlement Action Plans to be developed for the CBG mining concession by 2022**

Area	Year	Villages (# of inhabitants) <sup>3</sup>
Hamdallaye	2015	Hamdallaye (416), Fassaly Foutahbe (74)
Parawi	2018	Parawi (671), Gueguere (377)
Kagnéka	2021	Kagnéka (226), Horé Lafou (307)
Kourawel	2022	Kourawel center (296), Sintiourou Kourawel (58), Parawol Aliou (280), Paragogo (541)

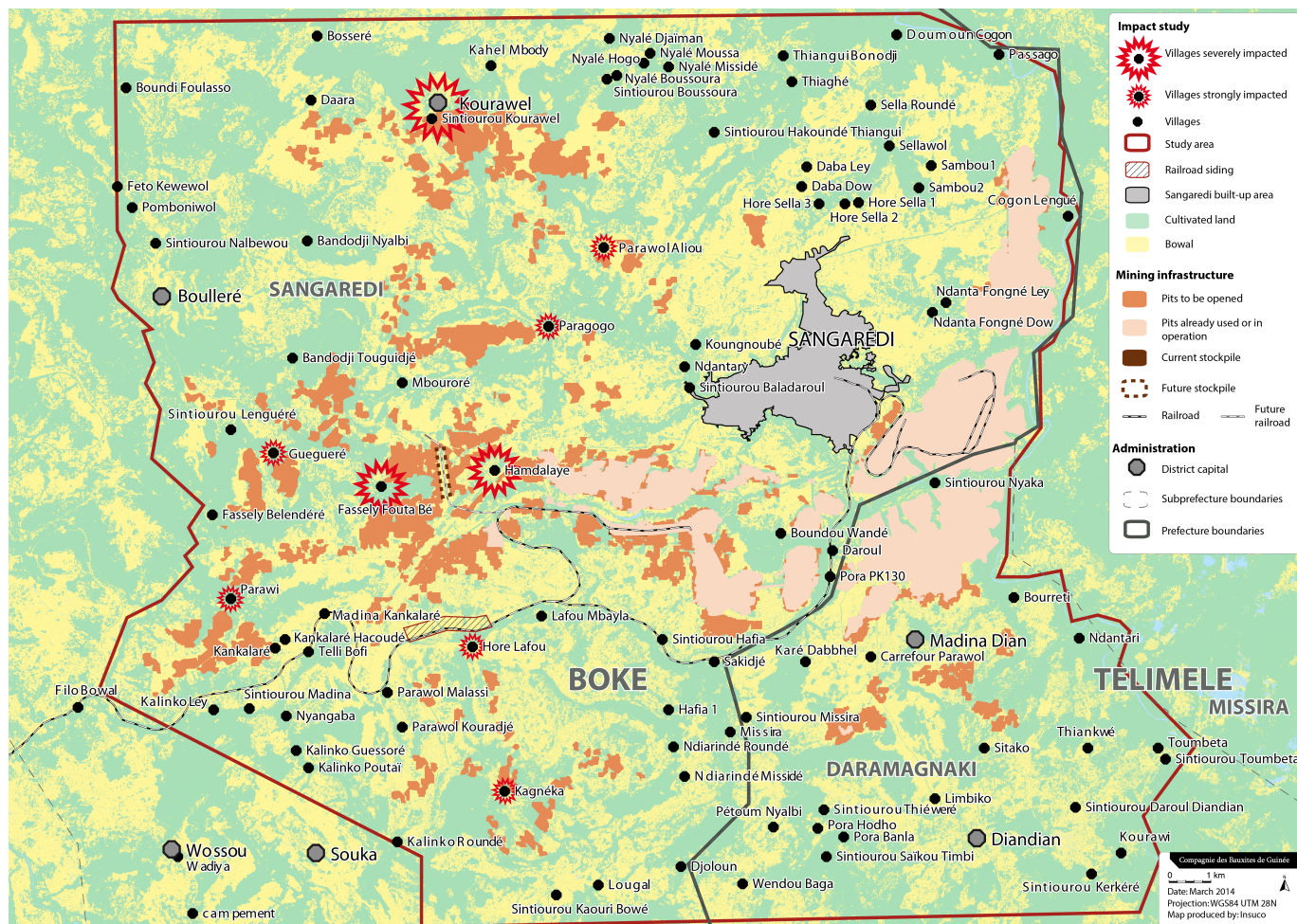
<sup>3</sup> Source : CBG Mine Expansion Project ESIA, 2015

It should be noted that, while impacts will be lower for the rest of the villages in the mining area, village land would still be affected in most of them. All villages in the mining concession will need to be taken into consideration when opening new areas to bauxite extraction or building project-related infrastructure.

In situations such as this, where only economic displacement is anticipated, CBG will continue to apply this framework including consultation of affected persons, grievance management, socio-economic surveys, asset surveys, cultural heritage mapping, the application of compensation principles and rates outlined in section 8 as well as monitoring and evaluation.



Map 2 - Mine zone villages with the greatest potential impact on land and housing (27.5 MTPA in 2022)





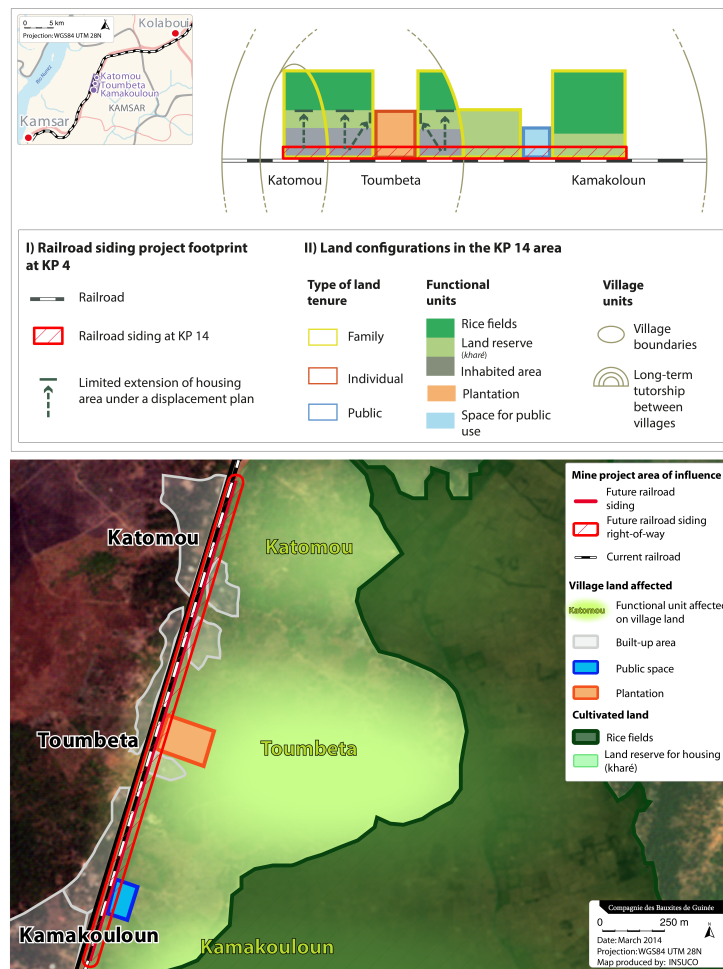
## **2.4 RAIL-CORRIDOR**

In the railroad zone, loss of land caused by the Project concerns the area where the new rail siding will be built (KP 14) near the villages of Toumbéta, Katoumou and Kamakouloum. The Expansion Project will use this new infrastructure for the 27.5 MTPA production scenario (2022). It is highly likely that work will begin several years before.

The footprint of this project component is relatively limited. However the territory of three villages will be affected: Katoumou, Toumbéta and Kamakouloun. Should CBG proceed with the 27.5 MTPA production scenario, economic and physical displacement in these villages will be managed through the preparation of a Resettlement Action Plan (RAP) or Livelihoods Restoration Plan (LRP).

Other impacts of physical and/or economic displacement in the rail corridor will be managed through RAPs and LRPs as appropriate.

**Map 3 - Expansion Project impact on Katomou, Toumbéta and Kamakouloun land near KP 14**



### 2.4.1 Port Area

In the port zone, land loss will mainly be related to the construction of 275 housing units for CBG employees (by 2017). No land will be lost with the construction camp because it will be built inside the industrial zone.

However, the location where the 275 workers' houses will be built is densely populated. Furthermore, the fields currently farmed by local residents between the railroad tracks (plant zone) will be requisitioned by CBG.

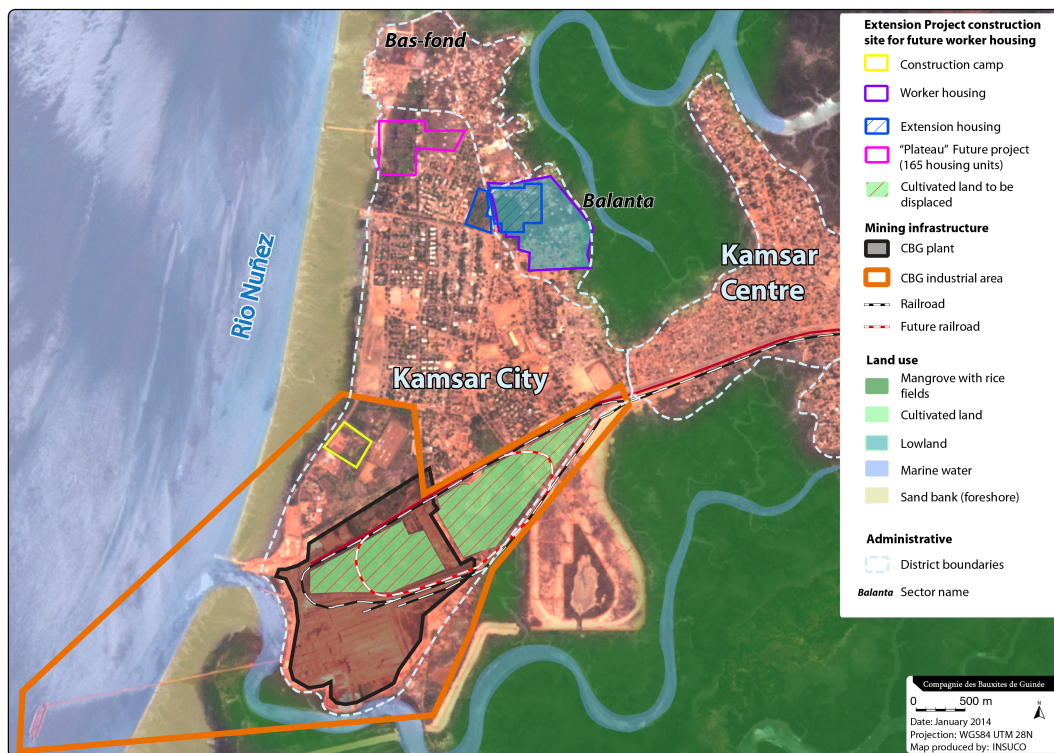
Construction of the 275 housing units for workers' families within Bas-Fond and Balanta will result in:

- Displacement of many households (the number remains to be determined later in the context of a Resettlement Action Plan to be developed for this zone) and infrastructure (public and private, including at least one high school).

Railroad construction at Kamsar may cause displacement of farms.

Map 4 shows the areas potentially impacted in Kamsar.

**Map 4 - Expansion Project impact areas in Kamsar**



Other economic and physical displacement in the factory and port area will be managed through the preparation of a Resettlement Action Plan (RAP) or Livelihoods Restoration Plan (LRP) as appropriate.

## 3 THE LEGAL FRAMEWORK

### 3.1 THE NOTION OF PROPERTY IN GUINEA

Article 39 of Guinea's Land Tenure Code adopted in 1992 defines three types of property rights holders:

1. Physical or moral persons holding a land title.
2. Physical or moral persons occupying land and holding proof of inclusion in the land registry, a permit to inhabit or a land occupation authorisation.
3. Physical or moral persons who can demonstrate peaceful and continuous land occupancy in good faith.

This third type of land-ownership has been interpreted as recognition of traditional land-use rights. However the Land Tenure Code makes no explicit reference to traditional land tenure systems and considers the State to be the only legitimate land authority (to own property, title must be issued by the appropriate level of government).

#### 3.1.1 Herding

While the Guinean Land Tenure Code does not formally treat compensation of land held under traditional land ownership structures, The *Code Pastoral* requires compensation of loss of or loss of access to common land used by herders. This compensation can take a number of forms including: the provision of alternative resources, infrastructures, and/or the implementation of programmes to provide ongoing support to herders (article 77).

### 3.2 CUSTOMARY LAND-TENURE

The dominant activity in the rural area of CBG's mining concession (where much of the economic and physical displacement will likely occur) is agriculture, followed by trade/employment and livestock herding in the rural zone. Soil fertility is generally restored by letting fields lie fallow and to a lesser extent by livestock wandering in the fallow fields.

Villages within the CBG Project area generally have a well-defined village territory (though specific boundaries are sometimes a subject of disputes between villages). Land is managed under a traditional land tenure system. Under this system, individuals do not “own” land, but enjoy some rights or are authorized by customary authorities to use resources in certain ways. Tenure rights can differ from one resource space to another (from a plain to a hillside, for instance), but a given resource space can be used for various purposes and have different types of status depending on the season (for example, a plain used to cultivate rice by one individual may be used to graze the village’s livestock in the off-season).

At the moment, the impact of the Guinean Land Tenure Code is very limited in rural areas, all the more so because it is better to be recognized as a landholder by the community living on the land concerned than by a State that has limited presence in the immediate vicinity and is unable to protect the landholder’s rights if the customary authorities do not recognize them.

### **3.3 MINING LAW**

The Guinean Mining Code was adopted in 2011 and partially amended in 2013. Article 123-127 of the Mining Code covers pre-existing property rights as well as compensation for a loss of land-use. The articles state that:

- the attribution of a mining lease does not extinguish pre-existing property rights;
- the government of Guinea has the right to impose expropriation of land on a property right holder for the public good; and
- that ‘legitimate occupants’ of land on the mining area are due compensation for loss of land-use rights or impacts to property and assets impacted by mining activities and that this compensation should be in proportion to the impacts caused.

Article 142 of the Mining Code further states that forced displacement caused by mining activity must include compensation for loss of revenue and livelihoods.

The Mining Code also provides for a 100-metre protection zone around buildings and infrastructures in proximity to mining and exploration activity.

Of importance for this RAP, Guinean mining law stipulates that while pre-existing property rights are maintained on land subject to a new mining lease, no new land title can be provided on an existing mining lease (this subject will be treated further in section 8 ).

### **3.4 INTERNATIONAL STANDARDS**

A number of international standards have been developed that cover involuntary resettlement. The International Finance Corporation's (IFC) Performance Standard 5 is the main norm to which CBG's resettlement approach will adhere. Requirements of Performance Standard 5 of relevance to CBG include:

- Avoiding involuntary resettlement through alternative project designs;
- Considering a number of land-tenure arrangements including individuals with formal and customary land-title and individuals with no recognised land-right;
- Improving the wellbeing of Affected Communities post resettlement or at a minimum ensuring that they are no worse off;
- Developing a Livelihoods Restoration Plan (LRP) in cases of economic displacement and a Resettlement Action Plan in cases of physical displacement;
- Compensating for losses at a minimum at "full replacement value";
- Offering in-kind compensation where possible including land-based compensation for losses of land and ensuring that in-kind compensation is of greater or at least equal value;
- Compensating for loss of livelihoods and loss of livelihoods resources, including alternate income generating activities where a livelihood activity is no longer viable;
- Engaging with Affected Communities throughout planning, implementation and monitoring of resettlement activities;

- Implementing an effective grievance mechanism to address specific concerns relating to compensation and relocation;
- Compiling a socioeconomic baseline of Affected Communities to identify and assess their wellbeing throughout and post implementation;
- Establishing criteria to determine eligibility for compensation and to discourage ineligible persons and speculators;
- Conducting surveys of affected assets and setting a formal cut-off date for assessment and compensation of losses;
- Offering feasible resettlement options in the case of physical displacement and providing relocation assistance;
- Offering adequate housing with security of tenure so as to avoid the possibility of future forced eviction; and
- Establishing a procedure for monitoring and evaluating the implementation of the RAP or Livelihoods Restoration Plan (LRP).

### **3.5 GAP ASSESSMENT**

Table 1 presents a comparison of Guinean law and IFC Performance Standard (PS5). Where there is divergence between Guinean Law and PS5, the more advantageous of the two standards to Affected Communities will be applied:



**Table 1 - Comparison of Guinean Law and IFC Performance Standard 5**

Subject	Guinean Legal Codes	IFC Performance Standard 5
Eligibility: landowners with a formal land title	Principle of just, prior compensation at fair market value in cases of land expropriation	Consideration of a number of types of land-tenure. Principle of limiting resettlement where possible and avoiding forced expropriation.
Eligibility: individuals and groups with customary land- tenure.	Treated as titled landowners according to article 39 of the Land Tenure Code which does not, however, effectively cover the complexity of customary land-tenure. Only the code pastoral formally recognises traditional land-use rights specifically for herders.	Objective of improving the quality of life of affected persons or at a minimum maintaining their quality of life. Establishment and dissemination of a cut-off date to determine eligibility for compensation.
Determination of compensation values	For all: compensation for loss of land, of loss of revenue and livelihoods. For herders, principal of in- kind compensation notably through: provision of alternative resources, infrastructures, and/or the implementation of programmes to provide	Notions of both economic and physical displacement requiring the development of either a livelihoods restoration plan or resettlement action plan. Notion of “full replacement value” which is the market value that will permit individuals and communities to replace all lost assets with new assets of a greater or equivalent



ongoing support to herders.

value.

Principle of in-kind and land for land compensation where possible.  
Offering feasible resettlement options in the case of physical displacement and providing relocation assistance.  
Compensation for all potential livelihood activities and resources including salaried work, agriculture, fishing, or other income sources stemming from the use of natural resources, business revenue and bartering.

Public Participation	Refer to international standards regarding consultation and participation of affected populations	Communication of appropriate information through informed prior consultation of effected persons.
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Subject	Guinean Legal Codes	IFC Performance Standard 5
Planning	Establishment of a resettlement action plan.	Development of a Resettlement Action Plan or Livelihoods Restoration Plan (for physical and economic displacement respectively). If the exact nature of physical and economic displacement is unknown, development of a Resettlement and Livelihoods Restoration Policy Framework.
Monitoring and Measurement	None	Establishing a procedure for monitoring and evaluate the implementation of the RAP or Livelihoods Restoration Plan (LRP)

## 4 THE PUBLIC PARTICIPATION PROCESS

Public participation of potential stakeholders will be a key aspect of CBG's approach to resettlement and livelihoods compensation. The IFC's handbook for preparing a resettlement action plan notes that "stakeholders include any individual or group affected by, or that believes it is affected by, the project; and any individual or group that can play a significant role in shaping or

affecting the project”<sup>4</sup>. For resettlement and livelihoods restoration activities, CBG will focus its consultation efforts on three types of stakeholders:

1. CBG Personnel – personnel whose work has the potential to affect the development or implementation of the RAP.
2. Project Affected Persons (PAPs) - the individuals directly affected by economic and physical displacement caused by CBG’ activities.
3. Host Communities - existing communities adjacent to or in close proximity to resettlement sites that are likely to be affected either positively or negatively by this resettlement.
4. Other Stakeholders - these can include:
  - Local authorities including representatives of the prefecture, sub-prefecture and districts as well as representatives of the rural and urban communes concerned.
  - Civil society organisations.
  - Members of Affected Communities no longer living in the community.

#### **4.1 CONSULTATION OF CBG PERSONNEL**

CBG personnel whose activities have the potential to affect the development and implementation of resettlement and livelihoods restoration measures will be engaged throughout the process in order to ensure a consistent approach to working with Affected Communities. These groups may include:

- Mine, rail, mill or port management: in order to inform them of the RAP and the development and implementation process and solicit their involvement in key decision-making steps including the selection and validation of resettlement sites;
- Exploration and mining personnel and subcontractors: in order to ensure no uncompensated activities occur on land that is the object of a Resettlement Action Plan;

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<sup>4</sup> IFC Handbook for Preparing a Resettlement Action Plan, Page 45

- Environmental personnel: in order to assess and plan the mitigation of potential environmental effects at resettlement sites;
- Community relations personnel: in order to ensure a coordinated approach to engage communities affected by physical and economic displacement.

## **4.2 CONSULTATION OF PROJECT AFFECTED PERSONS**

### **4.2.1 Informed Consultation and Participation**

The IFC's Performance Standard 1 requires "Informed Consultation and Participation" (ICP) for projects with "potential significant adverse impacts on Affected Communities"<sup>5</sup>. This type of consultation first and foremost needs to ensure that Affected Communities are able to understand the potential impacts of the undertaking for which consultation has been initiated and secondly that they are able to participate in an organised exchange of views and information. It is then incumbent on the project proponent to include these views into decision-making in relation to the project.

#### **4.2.1 Objectives**

CBG's consultation process for resettlement and livelihoods restoration has three broad objectives:

- Present the proposed undertaking including the potential resulting effects of physical and economic displacement;
- Build the capacity of Affected Communities to effectively understand and participate in the process of developing Resettlement Action Plans (RAP);
- Gather the view of Affected Communities regarding the planning and implementation of resettlement and livelihoods restoration activities with a specific focus on compensation of losses and the planning of physical resettlement (where this is required).

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<sup>5</sup> IFC Performance Standard 1, paragraph 31

#### **4.2.2 Consultation and Participation Process**

##### **Consultation in RAP Development**

Initial consultations will be held with community leadership in order to validate the consultation approach and validate a consultation timeline. As CBG has been an operating mine for over 30 years, this initial consultation may identify concerns relating to previous physical and economic displacement caused by the Project. The management of outstanding compensation related concerns and grievances is discussed in section 8.3.11.

Prior to consultation taking place, CBG will work with Affected Communities to nominate a facilitator capable of helping mobilise PAPs throughout the resettlement and livelihoods restoration process, of organising consultations and of receiving and grievances (see section 5 ).

Consultation activities will be structured around three thematic guides covering the main elements of the RAP:

- Theme 1: description of the project and project alternatives, potential physical and/or economic displacement effects, objectives of the RAP;
- Theme 2: grievance management, eligibility criteria, the cut-off date, socioeconomic and asset surveys;
- Theme 3: resettlement sites, the compensation approach for various potential losses (housing, infrastructures, land, etc.), livelihoods restoration, monitoring and measurement.

Consultation will focus on three key community groups: elders, youth and women. All consultation activities will be repeated for each of these three groups in order to ensure that the broad perspective of potentially impacted persons can be incorporated in RAP planning. Note that the full age range of adult males is captured within the “youth” and “elders” groups. Individuals fluent in the languages spoken in Affected Communities will lead the consultation activities.

Consultation in RAP development will be completed with a public presentation and validation of the final RAP document and any subsequent modifications to the RAP based on public comments.

### **Consultation in RAP Implementation**

Consultation will continue throughout RAP implementation in order to ensure that PAPs can effectively express their concerns and that CBG can make appropriate modifications to RAP implementation. A compensation and resettlement committee will also be formed for each community facing potential economic or physical displacement. The composition and functioning of these committees will be discussed further in section 13 .

## **4.3 PARTICIPATION OF HOST COMMUNITIES**

As will be discussed further in section 10 , CBG will prioritise resettling communities within their existing village territories in order to avoid impacts to host populations. Where this is not possible, CBG will consult host communities regarding the plans for resettling Affected Communities in their territory and work with host populations to identify and mitigate potential impacts including extending the benefits of compensation and livelihoods restoration programmes to host populations where necessary.

## **4.4 PARTICIPATION OF OTHER STAKEHOLDERS**

Local authorities – both statutory and customary - have a role to play both in the oversight of RAP development and implementation of a RAP including: participating in the selection of viable resettlement sites, officiating over the payment of compensation, and resolving grievances that cannot be resolved at either the community level or by CBG. These authorities can involve representatives of local prefectures, sub-prefectures and rural and urban communes in the RAP affected area. Local authorities – who are often also district or sub-district heads at the statutory level – will have a key role to play in mobilising their communities and helping to validate and approve the consultation approach prior to implementation.

## 4.5 DOCUMENTATION OF CONSULTATION

A record of attendance and minutes of consultation will be prepared at the end of each consultation. The community facilitator will review the record of attendance and the minutes of meetings will be read at the close of each consultation session in order to ensure accuracy and community acceptability of the record of consultation.

Consultation records will be recorded in a consultation documentation system<sup>6</sup> and analysed subsequent to consultations in order to:

- Code and cluster consultation results around key issue areas in the RAP (i.e. eligibility, resettlement sites, compensation approaches and levels, etc.) in order to ensure that community input is effectively captured and integrated in RAP development;
- Identify commitments made as well as plan and track the completion of actions to meet these commitments;
- Identify grievances (see section 5 for a discussion of grievance management); and
- Maintain an up to date database of RAP stakeholders that can be cross-referenced.

## 5 GRIEVANCE MANAGEMENT

In any resettlement and livelihoods restoration process it can be anticipated that a certain number of grievances will be raised by Project Affected Persons. These grievances can relate to a number of aspects of RAP development and implementation including:

- Eligibility;
- Compensation types and rates;
- Resettlement sites; and
- Misunderstandings or errors in asset inventories.

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<sup>6</sup> CBG currently employs the Borealis Stakeholder Engagement module for this purpose.

This section details the grievance management process to implement throughout the development and implementation of a RAP in order to assure that all grievances are managed to the satisfaction of affected people and in a timely manner.

## **5.1 ROLES AND RESPONSIBILITIES**

The following groups or individuals will have a role to play in the management of grievances:

### **1) Community level**

- a. The Community Resettlement Committee: a committee constituted at the level of the village to oversee resettlement and livelihoods restoration planning and implementation. This group also participates in the grievance management committee for level 3 & 4 grievances - outlined in Figure 2 below. For more on this committee, please refer to section 13.6.
- b. Community Facilitator: an individual selected by the communities whose duties would include the reception of grievances (shown in Figure 2 below). This role consists of collecting grievances from the affected community and transferring them to the CBG community liaison officer. For more on this role, please refer to section 13.6.1.

### **2) CBG**

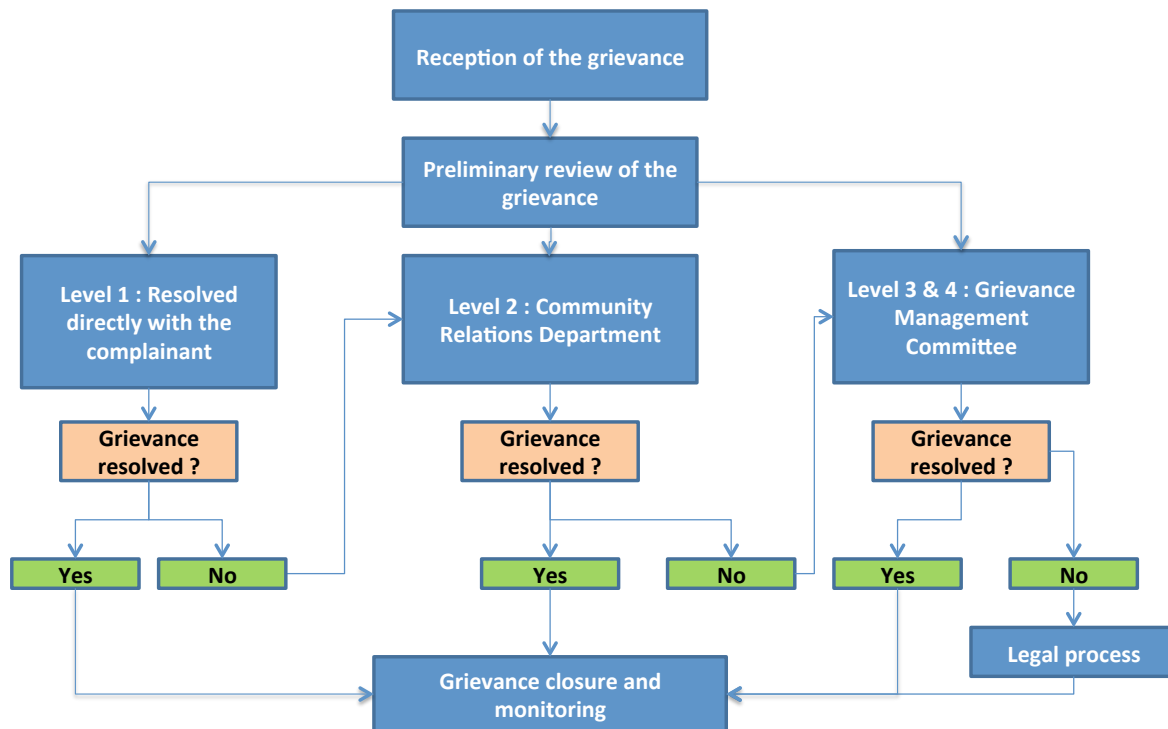
- a. CBG Community Liaison Officer: an individual charged with receiving complaints from the community, transmitting them to the Grievance Management Coordinator during the reception of the grievance phase in Figure 2 below and ensuring ongoing communication between CBG and the complainant regarding an outstanding grievance.
- b. CBG Grievance Coordinator: the individual responsible for receiving, evaluating and managing the various steps in the resolution of a grievance.

- c. CBG Community Relations Department: this group supports the Grievance Coordinator in the resolution of a grievance.
  - d. CBG Resettlement Steering Committee: this group participates in the grievance management committee for level 3 & 4 grievances - outlined in Figure 2 below. For more on the steering committee see section 13.3.
- 3) Local and statutory authorities
- a. The legal system: the Guinean legal system will be used as a last resort should the grievance management system fail to resolve the grievance.



## 5.2 GRIEVANCE MANAGEMENT PROCESS

Figure 2 –CBG RAP Grievance Management Process



### 5.2.1 Reception

The Grievance Coordinator receives the grievance and logs it in the grievance register and confirms receipt with the complainant. If there is immediate action required to stabilise the situation, the grievance coordinator will ensure that these actions are taken.

### 5.2.1 Preliminary Review

The Grievance Coordinator conducts a preliminary review and classification of the grievance according to its severity as outlined in Table 2.

**Table 2 - Grievance Classification Grid**

Level	Description
1	Isolated grievance with minimal impact to the community or CBG.
2	Repeated grievance with minimal impact to the community or CBG.
3	Isolated grievance with moderate or significant impact to the community or CBG.
4	Repeated grievance with moderate or significant impact to the community or CBG.

The Grievance Coordinator then meets with the complainant in order to understand the nature of the grievance and determine whether an immediate solution can be found.

### **5.2.1 Grievance Treatment**

#### **Level 1**

Ideally an immediate solution can be found for a level one grievance.

#### **Level 2**

If the complainant is not satisfied, the grievance is assessed by CBG's Community Relations Department and a solution is proposed.

#### **Level 3 & 4**

If the complainant is not satisfied, the grievance is addressed by a Grievance Management Committee composed of members of the Community Resettlement Committee (see section 13.6) and the CBG Resettlement Steering Committee (see section 13.3). This committee reviews the complaint, any steps to resolve it to date and proposes a solution to the grievance.

### **5.2.1 Legal Process**

If the complainant is unsatisfied at the termination of the grievance treatment process, the grievance is referred to the Guinean legal system for resolution as a last resort. CBG provides financial support to the complainant to retain legal aid from a list of 10 lawyers accredited by the Minister of

Justice and is further supported by the NGO retained to support the Project Affected Persons throughout the RAP process (refer to section 13 ).

### 5.2.1 Grievance Closure and Monitoring

The Grievance Coordinator assures the implementation of actions to resolve the grievance and conducts a visit within 40 days to assure that the grievance has been effectively resolved. Ongoing monitoring may also be required for certain types of grievances. Once all actions are implemented to the satisfaction of the complainant, a grievance completion report is provided to the complainant for final sign-off.

## 5.3 GRIEVANCE TREATMENT TIMELINES

Table 3 provides the maximum timelines for a linear treatment of a grievance.

**Table 3 - Grievance treatment timelines**

Step	Activity	Cumulative Days Level 1 & 2	Cumulative Days Level 3 & 4
Reception	Receipt of grievance	0	0
	Logging the grievance	0	0
Preliminary review	Review	7	7
	Development of grievance dossier	10	15
Grievance treatment	Assess grievance severity	10	20
	Definition of corrective action	15	30
	Arbitration	N/A	30
	Implementation of corrective action	15	40
Grievance closure and monitoring	Complaint monitoring	20	45
	Closure	30	50

## 5.4 DOCUMENTATION OF GRIEVANCE MANAGEMENT

The grievance management procedure will be thoroughly documented in the grievance register through the process of reception, assessment, treatment, closure and monitoring. At a minimum the following information will be recorded:

- The name of the complainant;
- The date of reception of the grievance;
- A description of the grievance;
- The grievance level;
- The status of treatment of the grievance;
- Roles and responsibilities for management of the grievance;
- Activities to resolve the grievance;
- Results of monitoring activities; and
- Complaint closure.

## **5.5 UNRESOLVED PAST GRIEVANCES**

CBG has set up a mechanism to capture grievances related to incidents that occurred between 2010 and 2015. An incident register was set up to indicate all relevant information about the events. An action plan register has also been set up to make sure to address and close each grievance.

## **6 SOCIOECONOMIC SURVEYS**

Socioeconomic surveys present a static portrait of an Affected Community. One of the main objectives of CBG's resettlement and livelihoods restoration approach is to improve or at a minimum maintain the wellbeing of communities affected by physical and economic displacement in association with its activities. Section 12 presents the monitoring and evaluation approach CBG will follow in order to assess whether CBG has been successful in this objective. In order to effectively monitor the evolution of community wellbeing throughout the implementation of a RAP, CBG will establish the socioeconomic baseline of an Affected Community during the RAP development phase.

This baseline will consist in completing a survey of households in the Affected Community covering the following aspects:

- Demographics
- Education

- Health
- Access to water
- Sanitation
- Housing
- Access to land
- Agriculture, herding and other livelihoods sources
- Material wellbeing

The household survey will also collect unique identifiers for each household to permit household identification throughout the process of RAP development and implementation. These data include: the name of household head, identity card numbers and photos of household members, phone numbers and geolocation of the principle dwelling.

The collection of baseline data will consist in: development of a household survey instrument, training of surveyors to perform the survey, deployment of the survey team, quality control of data, data collection into a database and compilation of baseline indicators for the Affected Community.

#### **6.1.1 Identification of Vulnerable Households**

Baseline data collection will also permit the identification of vulnerable households who, due to a variety of socioeconomic factors, are less able to improve or re-establish their livelihoods subsequent to the implementation of resettlement or livelihoods restoration efforts. As previously mentioned, vulnerable people will be a particular focus of CBG's resettlement and livelihoods restoration efforts in order to ensure that, subsequent to RAP implementation, these individuals and households are able to improve or at a minimum maintain their level of wellbeing. CBG will use the following definitions of vulnerability in order to identify vulnerable persons and households during the household survey:

- Female and child-led households;
- Households that do not own their place of dwelling;
- Landless households or those with limited land-access; and

- Households where the average revenue (monetary and non-monetary) is below the World Bank defined poverty line of US\$ 1.25<sup>7</sup>.

## 7 ASSET SURVEYS

Asset surveys will determine the physical assets to be affected by CBG's activities and therefore eligibility for compensation. These can include land, crops, natural resources (wood, water sources), housing and other structures as well as community infrastructures. This work involves surveying and classifying all assets in details as well as associating these with an affected household, household group or with the community (see section 8 for more on the classification of Project Affected Persons).

Note that for situations of significant potential loss of assets, CBG may rely on the services of a professional surveying firm to conduct the asset surveys. This will also have the effect of ensuring the perception of impartiality in the eyes of the affected population and enhance the credibility of the process.

### 7.1 ASSET SURVEY PROCESS

Prior to the initiation of asset surveys, CBG will develop an initial map of the impacted area identifying its activities in the RAP impact area. This will allow the identifying of specific impact areas where the asset surveys will focus.

During the asset surveys, GPS surveying instruments and photographs will be used to identify and assess the dimensions of affected land parcels and geolocalise other affected assets. The survey team will then associate the PAPs with their land parcels in order to properly identify personal and collective property.

The survey team will then work to classify all affected assets including:

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<sup>7</sup> Note that this last indicator involves financialising all sources of revenue including subsistence activities for a household and dividing it by the number of individuals in the household with adjustment for their ages.

- Profiling built structures based on their size, material and construction methods;
- Assessing the productivity of land (i.e. fertile market gardens, fallow land, grazing land, etc.);
- Identifying uses of land parcels including planting of annual crops, perennial crops and trees as well as grazing;
- Assessing the maturity and productivity of perennial crops and trees;
- Etc.

This work will allow CBG to effectively assess compensation rates for different categories of assets. For further discussion, please refer to section 8.3.

## **7.2 CUT-OFF DATES**

In order to limit the possibility of land speculation during the RAP process, a cut-off date will be established. This date marks the completion of asset surveys. New arrivals to the resettlement area after this date will not be eligible for resettlement and livelihoods compensation. Assets established after this date will also not be eligible for compensation.

The cut off date will be set by prefectural authorities in the RAP impact area and widely diffused by the CBG to all project affected persons prior to the initiation of asset surveys. A cut-off date will only be valid for a period of a year after the termination of asset surveys in order not to avoid placing undue limits on the natural growth of an Affected Community in advance of the initiation of resettlement and livelihoods compensation activities. After the period of a year has elapsed, asset surveys will need to be updated prior to implementation of a RAP.

## **8 ELIGIBILITY AND COMPENSATION**

The following section details how CBG will assess the asset ownership or use-right of Project Affected Persons, determine those eligible for compensation,

and set strategies for compensation. Please note that the process of physical displacement including selection and preparation of resettlement sites and moves is treated in section 10 .

## **8.1 KEY PRINCIPLES**

This section outlines key principles to which the CBG will adhere in the determination of eligibility and the development of compensation approaches for losses involving physical or economic displacement caused by its activities:

- CBG will compensate all loss of physical assets or economic activities caused either permanently or temporarily by its operations;
- CBG will inventory all lost physical assets or economic activities and associate these with the individuals or groups incurring the loss;
- CBG will consult with Affected Communities throughout the process of evaluating and compensation losses and take this consultation into account in fixing compensation strategies and rates (for more on this subject, please refer to section 4 );
- In-kind compensation will be favoured over cash compensation, especially for land and housing;
- Where livelihoods (land-based, wage-based or enterprise-based) are affected, CBG will work to develop alternate livelihoods that improve the long-term wellbeing of affected persons or groups;
- Compensation will be provided at full replacement cost in order to permit affected persons and groups to replace all lost assets with new assets of a greater or equivalent value;
- Compensation will include additional amounts to cover any additional costs incurred in association with the loss of physical assets and livelihoods including transaction costs, lost earning and the time to re-establish assets or livelihood generating activities;
- To avoid the impacts of inflation, compensation rates will be indexed to inflation and updated immediately prior to the implementation of a RAP;



- Although no new land title can be provided on land under a mining concession, CBG will furnish a written acknowledgement of traditional land tenure in the case of persons or groups receiving land-based compensation;
- An effective grievance process will be implemented to handle any conflicts regarding the assessment or distribution of compensations for loss of physical assets or livelihoods;
- PAPs will be effectively informed of the date, time and location for distribution of compensation payments;
- Receipts of compensation will be provided to PAPs subsequent to distribution of compensation.

## **8.2 ELIGIBILITY**

The notion of customary land-tenure recognises individual and collective asset usage and ownership rights for potentially affected assets such as land and housing. CBG divides Project Affected Persons into three broad categories:

- Project affected households or individuals;
- Groups of affected households;
- Affected Communities.

### **8.2.1 Project Affected Households or Individuals**

Generally speaking, households are constituted of a head and members who all contribute to the collective livelihood of the household (i.e. through agricultural labour, other revenue, pooling of household revenues, etc.). A number of household assets can be affected including agricultural land, non-agricultural land, living space, perennial crops, plantations and infrastructures. Household livelihood strategies may also be impacted including those based on natural resources, land-based livelihoods as well as business and wage-income.

CBG will assess losses for the entire household and sign a compensation contract with the household head on behalf of the affected household. This

individual will be responsible for dividing compensation between the members of the household according to the terms of the compensation contract.

### **Vulnerable households**

It should be noted that certain households or their members can be qualified as vulnerable due to a number of factors (see section 6.1.1). These households are likely to disproportionately feel the impacts of any disturbance to their livelihood and be less able to benefit from livelihoods restoration activities. For this reason, specific measures will be implemented to ensure the effective and sustainable compensation of vulnerable persons and households.

#### **8.2.2 Groups of Affected Households**

CBG can also affect the assets of household groups. These groups include:

- Groups of households belonging to common lineages or sub-groups of a lineage; and
- Groups of households not belonging to a common lineage.

Household groups often jointly own and administer land (cultivated land, fallow land, non-cultivated land, inhabited land) as well as plantations and infrastructures.

CBG will assess losses for assets and associated livelihoods for household groups and sign a compensation contract with one individual identified by the household group as their representative. This individual will be responsible for dividing compensation between members of the household group according to the terms of the compensation contract.

#### **8.2.1 Affected Communities**

Certain impacts are felt at the level of the community as a group. Collective assets (those held by the village of a group) can include: non-cultivated land (such as the grassed plateaux locally known as *bowé*); public infrastructures (i.e. sources of water and associated infrastructure, schools, mosques);

community land; roads and paths; cultural heritage resources (including springs, religious sites and cemeteries)

Communities are generally represented by a village chief. This individual will be responsible for signing a compensation agreement for losses at the level of the Affected Community.

### **8.3 COMPENSATION OF LOSSES**

This section presents the type of losses that could potentially be incurred by affected persons and groups as a result of CBG's activities as well as an entitlement matrix summarising the strategy for compensating these losses.

#### **8.3.1 Typology of Losses**

CBG has identified the following categories of losses

- Land;
- Infrastructure;
- Cultural heritage;
- Livelihoods; and
- Land-uses including agriculture, herding and other uses.

#### **8.3.2 Entitlement Matrix**

The entitlement matrix summarises the compensation strategy for the eligible groups and types of loss identified in the preceding sections. It should be noted that a PAP may be eligible for compensation related to losses of assets held at the household, lineage or village level (i.e. a household head compensated for the loss of a house at the level of their household may be due compensation for a building used by a group of households that they represent).

The matrix presents the following information:

- The affected asset;
- The category of affected person (i.e. household, household group);
- Identification and evaluation of the loss;

- Compensation strategies.

### 8.3.3 Land

Table 4 - Entitlements Matrix for Land

Affected Asset		Affected Group	Identification and evaluation	Compensation Strategies
Resource Spaces	Cultivated land, fallow land	Households	<ul style="list-style-type: none"> <li>• Identification of the household or individual</li> <li>• Delimit the land parcel (surface area)</li> <li>• Classification of the land parcel (land-type)</li> <li>• Evaluation methods</li> <li>• Valuation of the loss</li> </ul>	<ul style="list-style-type: none"> <li>• Land for land compensation where possible</li> <li>• Financial compensation where land for land compensation not possible</li> <li>• Livelihoods restoration projects for the household</li> </ul>
		Household groups	<ul style="list-style-type: none"> <li>• Identification of the group of affected persons</li> <li>• Delimit the land parcel (surface area)</li> <li>• Classification of the land parcel (land-type)</li> <li>• Evaluation methods</li> <li>• Valuation of the loss</li> </ul>	<ul style="list-style-type: none"> <li>• Financial compensation</li> <li>• Livelihoods restoration projects for the Household groups</li> </ul>
Resource Spaces	Non cultivated land (i.e. <i>bowé</i> , or other uncultivable land)	Households	<ul style="list-style-type: none"> <li>• Identification of the household</li> <li>• Delimit the land parcel (surface area)</li> <li>• Classification of the land parcel (land-type)</li> <li>• Evaluation methods</li> <li>• Valuation of the loss</li> </ul>	<ul style="list-style-type: none"> <li>• Land for land compensation where possible</li> <li>• Financial compensation where land for land compensation not possible</li> <li>• Livelihoods restoration projects for the household</li> </ul>
		Household groups	<ul style="list-style-type: none"> <li>• Identification of the group of affected persons</li> <li>• Delimit the land parcel (surface area)</li> <li>• Classification of the land parcel (land-type)</li> </ul>	<ul style="list-style-type: none"> <li>• Land for land compensation where possible</li> <li>• Financial compensation where land for land compensation not possible</li> <li>• Livelihoods restoration</li> </ul>

Affected Asset		Affected Group	Identification and evaluation	Compensation Strategies
Resource Spaces	Community land used for habitation (i.e. the village area)	Community	<ul style="list-style-type: none"> <li>Evaluation methods</li> <li>Valuation of the loss</li> </ul>	projects for the Household groups
			<ul style="list-style-type: none"> <li>Identification de la Community</li> <li>Delimit the land parcel (surface area)</li> <li>Classification of the land parcel (land-type)</li> <li>Evaluation methods</li> <li>Valuation of the loss</li> </ul>	<ul style="list-style-type: none"> <li>Land for land compensation where possible</li> <li>Financial compensation where land for land compensation not possible</li> <li>Livelihoods restoration projects for the Community</li> </ul>
		Household	<ul style="list-style-type: none"> <li>Identification of households</li> <li>Delimit the land parcel (surface area)</li> <li>Evaluation methods</li> <li>Valuation of the loss</li> </ul>	<ul style="list-style-type: none"> <li>Land for land compensation (replacement of the land area)</li> </ul>
		Household groups	<ul style="list-style-type: none"> <li>Identification of the household groups</li> <li>Delimit the land parcel (surface area)</li> <li>Evaluation methods</li> <li>Valuation of the loss</li> </ul>	<ul style="list-style-type: none"> <li>Land for land compensation (replacement of the land area)</li> </ul>
		Community	<ul style="list-style-type: none"> <li>Identification of the community</li> <li>Delimit the land parcel (surface area) or the size of the compensating infrastructure</li> <li>Evaluation methods</li> <li>Valuation of the loss</li> </ul>	<ul style="list-style-type: none"> <li>Land for land compensation (replacement of the land area) according to the type of infrastructure (i.e. school, mosque, health-centre, etc.)</li> </ul>

Affected Asset	Affected Group	Identification and evaluation	Compensation Strategies
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### 8.3.4 Infrastructure

**Table 5 - Entitlements Matrix for Infrastructure**

Affected Asset	Affected Group	Identification and evaluation	Compensation Strategies
Private infrastructure	Private buildings (dwellings and related structures)	Household	<p>Replacement of dwellings through an auto-reconstruction contract with payments upon the completion of key steps:</p> <ul style="list-style-type: none"> <li>(i) Foundations/building platform</li> <li>(ii) Walls</li> <li>(iii) Roof</li> <li>(iv) Finishing</li> <li>(v) Movement of household and possessions to the new dwelling</li> <li>(vi) Demolition of the old dwelling.</li> </ul> <p>Construction materials and tools will be provided to the household in kind. A construction firm will be charged with verifying the quality of the house platform/foundation and providing technical support and training to PAPs to ensure the necessary skills to build resettlement housing.</p>
Private infrastructure	Private buildings (dwellings and related structures)	Household groups	<p>Replacement of dwellings through an auto-reconstruction contract with payments upon the completion of key steps:</p> <ul style="list-style-type: none"> <li>(i) Foundations/building platform</li> <li>(ii) Walls</li> </ul>

Affected Asset		Affected Group	Identification and evaluation	Compensation Strategies
Private infrastructure	Other private infrastructures (i.e. housing platform, fencing, pen livestock pens, chicken coops)	Household	<ul style="list-style-type: none"> <li>Valuation of the loss</li> </ul>	(iii) Roof (iv) Finishing (v) Movement of household and possessions to the new dwelling (vi) Demolition of the old dwelling.  Construction materials and tools will be provided to the household in kind. A construction firm will be charged with verifying the quality of the house platform/foundation and providing technical support and training to PAPs to ensure the necessary skills to build resettlement housing.
			<ul style="list-style-type: none"> <li>Identification of the household or individual</li> <li>Classification of the infrastructure</li> <li>Dimensions and construction materials</li> <li>Evaluation methods</li> <li>Valuation of the loss</li> </ul>	Financial compensation based on a valuation of the loss.
			<ul style="list-style-type: none"> <li>Identification of the household groups</li> <li>Classification of the infrastructure</li> <li>Dimensions and construction materials</li> <li>Evaluation methods</li> <li>Valuation of the loss</li> </ul>	Financial compensation based on a valuation of the loss.
Public infrastructure	Roads and paths	Community	<ul style="list-style-type: none"> <li>Identification de la Community</li> <li>Classification of the</li> </ul>	In-kind compensation: construction of another road or path; granting a contract to a construction firm favouring labour-intensive construction



Affected Asset	Affected Group	Identification and evaluation	Compensation Strategies
		<ul style="list-style-type: none"> <li>infrastructure</li> <li>• Dimensions, location and socio-economic value of the infrastructure</li> <li>• Evaluation methods</li> <li>• Valuation of the loss</li> </ul>	techniques with requirements to maximise local employment.
Public infrastructure	Schools, health centres Community	<ul style="list-style-type: none"> <li>• Identification de la Community infrastructure</li> <li>• Dimensions, location and socio-economic value of the infrastructure</li> <li>• Evaluation methods</li> <li>• Valuation of the loss</li> </ul>	<p>In-kind compensation: construction of an infrastructure of greater or equal value; granting a contract to a construction firm favouring labour-intensive construction techniques with requirements to maximise local employment.</p> <p>Transportation assistance to alternate schools or health centres during the construction period should a school or health centre be demolished prior to the commissioning of a new facility.</p>
	Wells and associated infrastructures Community	<ul style="list-style-type: none"> <li>• Identification de la Community</li> <li>• Classification of the infrastructure</li> <li>• Number of wells and associated infrastructure according to the size and dispersion of the population.</li> <li>• Evaluation methods</li> <li>• Valuation of the loss</li> </ul>	<p>In-kind compensation: identification of the optimal locations for wells and associated infrastructure.</p> <p>Granting a contract to a construction firm favouring labour-intensive construction techniques with requirements to maximise local employment.</p> <p>Support for the ongoing maintenance of wells and associated infrastructures</p>

### 8.3.5 Cultural Heritage

**Table 6 - Entitlements Matrix for Cultural Heritage Resources**

Affected Asset		Affected Group	Identification and evaluation	Compensation Strategies
Cultural heritage assets	Mosques	Community	<ul style="list-style-type: none"> <li>• Identification of the community</li> <li>• Classification of the infrastructure</li> <li>• Evaluation methods</li> <li>• Valuation of the loss</li> </ul>	<ul style="list-style-type: none"> <li>• In-kind compensation: construction of a mosque of greater or equal value; granting a contract to a construction firm favouring labour-intensive construction techniques with requirements to maximise local employment.</li> </ul>
	Cemeteries	Community	<ul style="list-style-type: none"> <li>• Identification of the community and responsible person for managing the site where possible</li> <li>• Classification of the site and its importance</li> <li>• Determination with the community of the procedures to follow in the case where displacement is necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Protective measures to maintain the cemetery at its current location as a first priority</li> <li>• Movement of the cemetery to a new location and by means acceptable to the Affected Community.</li> </ul>
	Other	Community	<ul style="list-style-type: none"> <li>• Identification of the community and responsible person for managing the site where possible</li> <li>• Classification of the site and its importance</li> <li>• Determination with the community of the procedures to follow in the case where displacement is necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Protective measures to maintain the site at its current location as a first priority</li> <li>• Movement of the site to a new location where it cannot be maintained in its current location (if possible).</li> </ul>

### 8.3.6 Livelihoods

**Table 7 - Entitlements Matrix for Livelihoods**

Affected Asset	Affected Group	Identification and evaluation	Compensation Strategies
Loss of livelihoods	Household	<ul style="list-style-type: none"> <li>• Identification of the household or individual</li> <li>• Classification of the value of the livelihoods generating activity</li> <li>• Methods for calculating revenues</li> </ul>	<ul style="list-style-type: none"> <li>• Livelihoods restoration projects to be defined in consultation with the Affected Population with the support of a development NGO for training and implementation.</li> </ul>
Economic disruption	Household	<ul style="list-style-type: none"> <li>• Identification of the household or individual</li> <li>• Classification of the revenue and the type and duration of disruption</li> <li>• Methods for calculating revenues</li> </ul>	<ul style="list-style-type: none"> <li>• Financial compensation equal to the loss suffered during the period of disruption.</li> </ul>
Economic vulnerability	Household	<ul style="list-style-type: none"> <li>• Identification of the household</li> <li>• Measure of livelihood sources and strategies of the population (through the socioeconomic surveys and ongoing monitoring)</li> <li>• Methods for calculating</li> </ul>	<ul style="list-style-type: none"> <li>• Financial compensation</li> <li>• Vulnerable household support programmes</li> </ul>

Affected Asset	Affected Group	Identification and evaluation	Compensation Strategies
		livelihoods indicators	

### 8.3.7 Land-use

**Table 8 - Entitlements Matrix for Land-Uses**

Affected Asset		Affected Group	Identification and evaluation	Compensation Strategies
Trees and plantations	Perennial crops, fruit trees, forestry resources, medicinal crops	Household	<ul style="list-style-type: none"><li>• Identification of the household</li><li>• Characterisation of the crop</li><li>• Evaluation methods</li><li>• Valuation of the loss</li></ul>	<ul style="list-style-type: none"><li>• In-kind compensation where possible to replace crops.</li><li>• Financial compensation phased over time equivalent to the loss of production during the period required for the crop or tree to return to equivalent production.</li></ul>
		Household groups	<ul style="list-style-type: none"><li>• Identification of the household</li><li>• Characterisation of the crop</li><li>• Evaluation methods</li><li>• Valuation of the loss</li></ul>	<ul style="list-style-type: none"><li>• In-kind compensation where possible to replace crops.</li><li>• Financial compensation equivalent to the loss of production during the period required for the crop or tree to return to equivalent production.</li></ul>
Herding	Pasturage for herders	Household	<ul style="list-style-type: none"><li>• Assessment of the identified lands</li><li>• Identification of the household</li><li>• Evaluation methods</li><li>• Valuation of the loss</li></ul>	<ul style="list-style-type: none"><li>• In-kind compensation to ensure the maintenance in viability of herding activities (i.e. construction of enclosures, provide access to water and watering infrastructures)</li></ul>

### **8.3.8 Determination of Compensation Rates**

While the entitlement matrix summarise the essence of the compensation strategy for different categories of losses, specific rates of compensation will need to be calculated as part of RAP development in order to determine specific levels of compensation. The development of compensation rates will involve conducting a detailed inventory of specific affected assets and a determination of the full replacement cost of these assets. Replacement cost will be determined by two means:

1. Consultation with relevant government departments for specific asset types (i.e. the agricultural department, local prefectures and sub-prefectures, prefectural water and forestry management services, etc.
2. A survey of local markets (though not in the Affected Community itself in order to avoid speculation) in order to determine the full replacement cost of assets.

Market studies will assess the average value of affected assets across the immediate region of the Affected Community with adjustments for seasonality where applicable. Once compensation rates have been assessed, they will be validate and agreed upon with Affected Communities prior to the completion of RAP development. Finally, all compensation rates will also be adjusted for inflation immediately prior to the implementation of a RAP.

### **8.3.9 Livelihoods Restoration**

Further to the discussion of livelihoods restoration approaches summarised in Table 8, CBG will work closely with Affected Communities through the process of public participation (refer to section 4 ) to assess potentially affected livelihoods (land-based, wage-based, and enterprise-based) and identify preferred livelihoods restoration projects. For projects impacting a large number of households, CBG will work with a development NGO to:

- Facilitate discussion with the Affected Community regarding livelihoods restoration;
- Design livelihoods restoration projects with the Affected Community;

- Support the community throughout the implementation of livelihoods restoration activities.

While specific livelihoods restoration projects will be defined in collaboration with the impacted community, livelihoods restoration projects could include:

- Agricultural support programmes including: support for improving agricultural practices and techniques, providing access to agricultural inputs such as fertilisers, improved seeds and equipment; and
- Alternate livelihoods development programmes: including training, microfinance and other support to allow PAPs to develop alternate livelihoods.

#### **8.3.10 Compensation Process**

The assessment of compensations and disbursement of cash and in-kind compensation will be overseen by the compensation commission (please refer to section 13.5 for more information on this commission). Contracts will be developed by CBG legal services for those eligible to receive compensation on behalf of themselves, their household, household group or community. The contract will specify the lost assets and livelihoods as well as the in-kind and cash compensations for these losses and dates for disbursement of compensation. The contract will include a commitment by the CBG to pay the compensation outlined as well as a commitment by the affected household, household group or community to vacate land and cede assets at a date agreed upon by both parties.

Contracts will be presented to persons eligible for compensation in a formal ceremony under the supervision of the compensation commission. Upon disbursement of compensation, both parties will sign a receipt of compensation with a copy provided to eligible persons and an additional copy maintained by CBG as proof of disbursement of compensation. Photographs of restored assets (i.e. housing, infrastructure) may also be included as additional proofs in compensation records.

## **Payments**

Payment by cheque or automatic transfer will be favoured by CBG. CBG will support PAPs in opening bank accounts in order to receive compensation. This support may include supporting them in obtaining government issued identity cards as a precondition to open a bank account.

## **Financial Management**

The payment of cash compensation to individuals with substance livelihoods can lead to long-term impoverishment as money to replace assets and livelihoods resources may be misspent. CBG will provide financial management training to PAPs receiving significant cash payments. This training may include local NGOs and representatives of local banks and will focus on:

- Usage of banks; and
- Household savings and expenditure planning.

To the extent possible, cash payments to PAPs will be staggered over time (i.e. to compensate an extended period of lost agricultural production payments will be made over several seasons) in order to avoid financial mismanagement and risks of impoverishment while the affected person or household is in the process of re-establishing their livelihood.

### **8.3.11 Management of Outstanding Compensation Claims**

The ESIA noted community concerns in relation to prior compensation for past economic and physical displacement (see section 1.3). Subsequent to the submission of the ESIA CBG has resolved outstanding compensation files dating from 2010-2015 and maintains a compensation register to track compensations paid and the status of compensation files. In addition, all compensations have been and will continue to be evaluated through a livelihood survey to determine impact to families or individuals. For more on the monitoring and evaluations process for future compensations please refer to section 12 of this document.

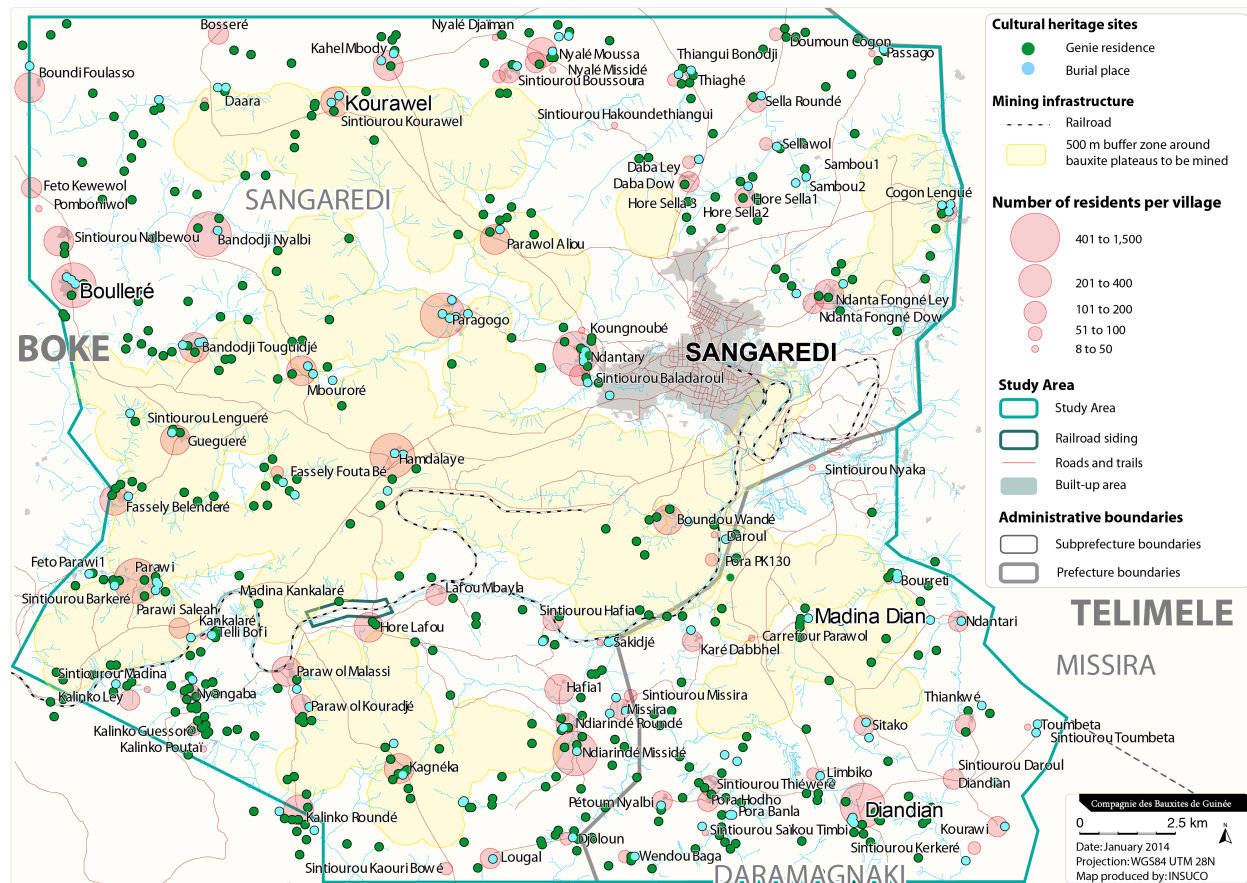
Despite these efforts, it is still possible that the development of a RAP will encounter claims of existing, unresolved compensation files. Should this be the case, CBG will work during the RAP development phase to integrate the resolution of these claims into the development of a RAP in accordance with the process laid out in this document.

## 9 CULTURAL HERITAGE RESOURCES

The protection of cultural heritage resources including areas of religious, social and cultural significance such as cemeteries and water sources is a key preoccupation of Affected Communities during the planning and implementation of a RAP. The Social Baseline Assessment conducted as part of the Expansion Project ESIA identified cultural heritage sites in the mining concession with the 500-metre security buffer around future areas of bauxite extraction. The study also compiled a description of each site as well as an indicator of its importance to the local population and the potential for displacement or compensation.



Figure 3 – Cultural Heritage Sites in the Mining Concession



During RAP development, CBG will work with Affected Communities to ground-truth the identified cultural heritage sites, identify any additional sites and work closely with community leadership and religious representatives to develop mutually acceptable approaches to protect and where this proves impossible move or plan for the compensation of cultural heritage resources.

## 10 RESETTLEMENT SITES

In the event of physical displacement of a community, CBG will work with the Affected Community to identify a suitable site, prepare the site for habitation, and plan and implement moves of the population. CBG will also implement effective programmes to manage population influx and

speculation at resettlement sites and implement measures to officialise land-tenure of displaced people subsequent to their resettlement.

### **10.1 KEY OBJECTIVES**

The selection of resettlement sites will aim to meet the following objectives:

- Where possible, resettle communities within their existing territory in order to minimise impacts on host populations;
- Implement a participative and transparent process for site selection and preparation in order to ensure the acceptability and long-term suitability of resettlement sites;
- Ensure that resettlement sites are outside of the 500 metre security buffer from mining activities;
- Assess the potential environmental impacts of resettlement sites and implement effective plans to mitigate these impacts;
- Ensure that resettlement sites are equal in size to the previous site and anticipate growth of the community in the selection of resettlement sites;
- Ensure access to resources upon which the Affected Community's livelihoods depend;
- Ensure that long-term mine planning is taken into account in the selection of resettlement sites in order to avoid having to resettle communities more than once;
- Work to improve community infrastructure at resettlement sites including sanitation and access to water;
- Ensure that access to key services (education, health, markets, mosques) is not compromised at resettlement sites and where this cannot be accomplished, ensure local provision of these services including building and commissioning associated infrastructure where required;
- Rebuild community infrastructure (schools, health posts, roads, etc.) in accordance with applicable Guinean regulations;

- Favour community-built resettlement where practical providing materials, tools, technical assistance and training as necessary;
- Where this is not possible, favour labour intensive construction techniques and work to maximise local employment;
- Provide support during the period of moves to ensure a seamless transition including the provision of additional support to vulnerable households; and
- Provide security of tenure to Projected Affected Persons subsequent to resettlement.

## **10.2 SITE SELECTION PROCESS**

The site selection process for resettlement sites will be participative in nature in order to assure that all relevant criteria are taken into account and that the rationale behind the final selection of sites is clear and acceptable to PAPs.

### **10.2.1 Identification of Acceptability Criteria**

An initial step will involve working with PAPs, members of civil society and local government to identify key socioeconomic and environmental criteria to take into account in the selection of resettlement sites. CBG will also work with its engineers internally to determine appropriate technical criteria in relation to its operations that need to be taken into account in the selection of resettlement sites. CBG in collaboration with PAPs will then rank the relative importance of these criteria and identify any non-negotiable criteria that a resettlement site must absolutely meet.

### **10.2.2 Site Identification and Evaluation**

CBG will then work with the Community Resettlement Committee, local government representatives and NGOs to identify potentially suitable sites. These sites will then be evaluated against the acceptability criteria using an evaluation matrix (presented in Figure 4) in order to assess the suitability of resettlement sites. This analysis will also identify areas where a selected resettlement site may not meet key criteria indicating areas where additional

mitigating measures will be required to ensure the long-term suitability of a resettlement site.

**Figure 4 – Resettlement site evaluation matrix**

Criteria	Weighting	Site 1	Justification	Site 2	Justification	Site 3	Justification
<b>1 - Technical Criteria (CBG)</b>							
<b>2 - Environmental Criteria</b>							
<b>3- Socioeconomic Criteria (Community)</b>							
<b>Weighted Results</b>		<b>0.0</b>		<b>0.0</b>		<b>0.0</b>	

### 10.3 RESETTLEMENT SITE DEVELOPMENT

Resettlement sites will be developed in order to provide improved conditions or at worst similar conditions to the original community location. Resettlement site development will involve:

- Preparing and grading the site;
- Ensuring effective buffering between the site and nearby mining, transportation or processing operations;
- Developing an urban plan including the overall layout of the community, the location of community infrastructures and appropriate zoning (residential, economic, public, cultural, etc.);
- Subdividing the site into individual lots;
- Providing infrastructure including roads and utilities such as water and sanitation.

Development of the site layout and preparation of the site will be a participative process conducted in collaboration with the Community Resettlement Committee.

#### **10.4 REGULARISATION OF LAND-TENURE**

While no new land title can be granted on the mining concession, CBG will issue a land-use contract to resettled households recognising their traditional land-right. This contract will be valid for the life of the mine. Subsequent to the extinguishment of mining title on resettled sites, CBG will support holders of a land-use contract in obtaining formal land-title through the Guinean government (refer to section 3.1 for more information on the legal framework regarding land-tenure in Guinea).

#### **10.5 MOVES**

CBG will establish dates for moves in collaboration with the Community Resettlement Committee and notify affected households of moving dates and activities associated with moves well in advance in order to allow for them to prepare. Prior to the initiation of moves, resettled persons and households will be invited to visit the resettlement site to do a final sign-off to indicate that the new house is fit for occupation and is consistent with the housing promised in their compensation contract.

CBG will provide assistance to Project Affected Persons throughout the process of moving from the old site to the new site including transportation allowances and allowances for disruption in livelihoods activities. CBG will also implement supplementary measures to support vulnerable persons and households throughout the moves process.

To the extent possible, CBG will use local labour from the Affected Community to implement moves.

## **10.6 INFLUX MANAGEMENT**

Influx management can be a significant issue in mining-development given the proximity to mining activities and associated economic opportunities. Influx can strain the access of host populations to livelihoods resources and overwhelm community infrastructure and services leading to general impoverishment. While acknowledging that CBG has been in operation for over 30 years and will therefore be unlikely to face the degree of population influx of a greenfield site, influx management will nonetheless be an important component of CBG's resettlement approach. The CBG will therefore deploy plans to manage influx both in general and in the context of the development of a RAP.

### **10.6.1 General Influx Management**

CBG has committed to the development of an Influx Management Plan for its operations as part of the Environmental and Social Impact Assessment of its expansion project. This document will therefore not treat influx management in relation to CBG's operations. One subject that will briefly be touched upon here, is the management of influx on land within the mining concession that may eventually be required for bauxite extraction or the siting of related infrastructure.

Section 2.3 identifies specific cases of physical and economic displacement that will be caused association with CBG's Expansion Project. In advance of the development and implementation of RAPs for each of these cases CBG will need to actively manage the risk of population influx into these areas as well as speculative construction. While CBG will further detail its plan for managing this type of influx in its Influx Management Plan, strategies the CBG may employ to manage this type of influx include:

- Regular high-level asset surveys based on satellite imagery or regular visits by CBG field teams to assess the increase in construction of housing, clearing of land and implied population growth;
- Collaboration with local and customary authorities to plan means to limit speculative land-occupation and construction; and

- Engagement with recent settlers in order to identify alternate settlement sites or otherwise address their needs while minimising occupation and construction in areas targeted for mining activities.

#### **10.6.2 Influx in the Context of a Resettlement Action Plan**

Influx and land speculation are key risks in Resettlement Action Planning. The value of land at resettlement sites may increase due to opportunistic purchases subsequent to the selection of a resettlement site (note that this problem will be worse in urban areas where a private property market operates and less so in rural areas where customary land-tenure is the norm).

The primary means of controlling influx will be a reliance on traditional land-management structures in affected villages in CBG's area of operations. Under customary land-tenure arrangements property is not bought and sold on a financial market. Further, new arrivals require the permission of traditional leadership in order to settle in the territory of a village. CBG will present the risks of influx and property speculation during public consultation and work with the Community Resettlement Committee to implement approaches to control population influx and land speculation.

## **11 ENVIRONMENTAL MANAGEMENT**

CBG will assess the baseline environmental conditions at resettlement sites including:

- The physical environment: air, dust, noise, vibrations, water
- The biological environment: flora and fauna

CBG will then model any potential impacts related to the establishment of the resettlement site and the presence of nearby mining activities and any other potential sources of impact. This information will be taken into account both in the context of site selection (see section 10.2 for more on this) and in the planning of effective mitigation measures to manage potential environmental impacts at the resettlement site.

## 12 MONITORING AND EVALUATION

CBG's resettlement approach aims at ensuring that affected persons are better off or at least as well off subsequent to the implementation of resettlement and livelihoods compensation measures. To ensure the successful implementation of a RAP, CBG will undertake both monitoring and evaluation activities.

- Monitoring activities: involve a regular assessment of the livelihoods of affected persons and households subsequent to the implementation of a RAP.
- Evaluation activities: involve both internal assessment to assess the effectiveness of RAP implementation and a completion audit to certify that livelihoods have been effectively restored.

### 12.1 MONITORING

The socioeconomic survey conducted during the development of a RAP identifies a baseline against which to measure the ongoing wellbeing of project affected persons and households throughout the implementation of resettlement and livelihoods restoration activities.



Table 9 provides a summary of indicators the CBG will measure throughout the implementation of a RAP in order to ensure the improvement or at minimum, restoration of household standards of living subsequent to the implementation of resettlement or livelihoods restoration efforts. The frequency of monitoring activities will be determined on a context-by-context basis. At a minimum, a socioeconomic survey covering the indicators outlined in

Table 9 will be updated 3 and 5 years subsequent to the implementation of a RAP. Monitoring reports will be provided to the Resettlement Unit and Resettlement Steering Committee. These reports will also serve as evidence of livelihoods restoration for the purposes of internal and external evaluation.

**Table 9 - Key socioeconomic indicators**

Indicator	Description
Number of inhabitants	Number of individuals residing in the community. An indicator of demographic growth and the viability of the community.
Average household size (population/number of households)	Number of individuals per household. An indicator of the growth of the community. New arrivals are often dwelling alone or in small numbers and only bring dependents once established.
Rate of population under 15 years of age	Number of individuals 15 years and under divided by the total population. Generally a higher rate of population 15 years and under indicates a smaller working-aged population with more dependents.
Rate of access to housing (owned)	Number of households owned by the household head divided by the total number of households. As community size increases and new arrivals establish themselves, this rate may tend to decline indicating a potential increase in vulnerability.
Number of individuals per room	Number of individuals per household on average divided by the number of rooms on average per house. This indicates the level of crowding in households and can be an indicator of growing impoverishment or wealth.
Index of housing quality	Quality of aspects and attributes of housing. A score is calculated based on the quality and materials used for walls, roofing and housing platforms. This index is an indicator of the wellbeing of households.
Index of assets and equipment	Degree of material of a household by assigning a score based on the assets and equipment of the household including: consumer goods, electronics and transportation-related goods. This index is also an indicator of the wellbeing of households.
Index of educational attainment	Percentage of children in the community aged 7 to 14 enrolled in school. Increased levels of enrolment can be an indicator of decreased household vulnerability.
Level of literacy in French	Percentage of the population 15 years and older able to read and write French. It is a good indicator of the general level of education.
Level of access to the public health system	A number of indicators including the level of vaccination of children under 15 years, the level of usage of mosquito nets, the degree of knowledge about HIV/AIDS. This is an indicator of the health profile of the community and consequently of its likely access to health resources.

Rate of use of an improved water source	Percentage of households using a hand-pump to access their potable water. Another indicator of the health of the community and their ability to safely fulfill their basic needs.
Rate of utilisation of latrines	Percentage of the population using traditional or improved latrines. An indicator of the sanitary conditions in the community.
Rate of dependence on natural resources	Percentage of the active population (15 years and older) declaring a resource based livelihood (i.e. agriculture, herding, fishing, other natural resource harvesting) as the main means of subsistence. This can indicate an increased diversification of subsistence strategies and a potential reduction of vulnerability in the community.
Rate of landless community members	Percentage of those with land-based livelihoods who do not have access to land without paying compensation for this access. This can provide an indication of increased vulnerability as a consequence of land-take associated with resettlement and livelihoods compensation.
Rate of households self-sufficient in rice	The percentage of households able to provide for their annual household consumption of rice. A basic indicator of household wellbeing.
Length of the period relying on bought rice.	The number of months per year that households need to rely on purchases of rice for their consumption. An additional indicator of household wellbeing.
Average revenue (US D/CU/Day)	The average revenue (estimated based on all livelihood generating activities of a household) expressed in US dollars per day by unit of consumption (defined by age of household member). A monetary-based indicator of wealth allowing for both an appraisal of overall household income and a comparison between households.

## 12.2 EVALUATION

### 12.2.1 Internal Evaluation

On an annual basis, CBG will hire an external social auditor with experience in resettlement and livelihoods restoration to conduct a third party evaluation of resettlement and livelihoods compensation projects. The goals of this review include:

- Evaluating the implementation resettlement and livelihoods compensation activities against the terms of the RAP, this Resettlement

and Livelihoods Compensation Framework as well as applicable Guinean laws and international standards;

- Assessing the extent to which the livelihoods of Project Affected Persons have been restored;
- Providing recommendations for improving RAP implementation.

The social auditor's report will be reviewed by the Resettlement Unit and Resettlement Steering committee (see section 13 ) in order to identify and implement any corrective actions addressing gaps in RAP implementation.

### **12.2.2 Completion Audit**

Depending on the scale of resettlement or livelihoods restoration, the IFC may require a completion audit in order to ascertain whether a RAP has been well developed and implemented. This completion audit will:

- Determine whether all compensations have been fully disbursed including cash and in-kind compensation and livelihoods restoration projects;
- Review the results of monitoring against baseline conditions (see section 12.1) in order to determine whether household wellbeing has been improved or at a minimum restored; and
- Determine any corrective actions required to address gaps in RAP implementation and/or livelihoods restoration.

The completion audit will be conducted after all compensations have been disbursed and after all RAP-related activities have been completed. Given the time that can be required to effectively restore livelihoods, a completion audit will generally occur 3 to 5 years subsequent to the initiation of RAP implementation. Should corrective actions be required, the Resettlement Unit and Resettlement Steering Committee will plan and oversee the timely implementation of these actions. Should no corrective actions be identified, the completion audit will mark the end of RAP implementation.

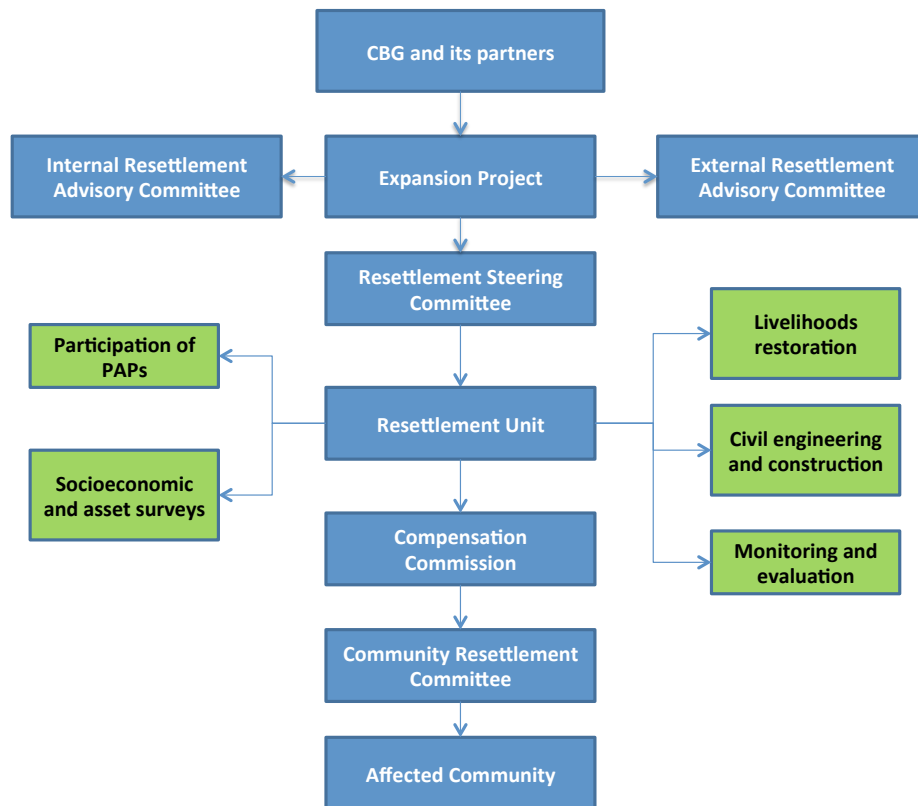
Should the IFC not mandate a completion audit, CBG will rely on internal evaluation reports to indicate that compensations have been completely

disbursed and livelihoods effectively restored before considering a resettlement and livelihoods compensation file closed.

## 13 ORGANISATIONAL RESPONSIBILITIES

This section details the roles and responsibilities of key groups and individuals involved in the development and implementation of Resettlement Action Plans at the level of: the CBG organisation, Affected Communities, civil society, local and national government. Figure 5 shows the key actors in the development and implementation of a RAP. The roles of specific groups are discussed below (with the exception of CBG, it's partners and the Expansion Project which have been discussed in section 0 of this document).

Figure 5 – Key actors in RAP development and implementation



### 13.1 INTERNAL RESETTLEMENT ADVISORY COMMITTEE

CBG and the Expansion project have put together an internal advisory committee comprising experts from its partner organisations (Rio Tinto Alcan, Alcoa, Dadco) who advise the project on environmental and social aspects in relation to the project. These experts will oversee the production and implementation of a RAP.

### **13.2 EXTERNAL RESETTLEMENT ADVISORY COMMITTEE**

The CBG Expansion Project has also formed an external advisory committee of resettlement experts to review all RAP documents prior to submission and oversee RAP implementation.

### **13.3 RESETTLEMENT STEERING COMMITTEE**

The Resettlement Steering Committee will liaise between CBG management and the Resettlement Unit. It will ensure that all resettlement and livelihoods restoration activities conform with:

- The policies and norms of CBG and its partners;
- Applicable Guinean laws;
- International standards;
- The Expansion Project Environmental and Social Management Plan; and
- Requirements of the Resettlement and Livelihoods Restoration Policy Framework.

Alongside its responsibilities for assuring the conformity of resettlement and livelihoods compensation activities, the Resettlement Steering Committee will be responsible for coordinating the implementation of the RAP, including:

- Facilitating transmission of information between CBG and Project Affected Persons;
- Ensuring that effective participation of PAPs in the development and implementation of a RAP;
- Ensuring that a RAP is fit for the context and needs of PAPs;
- Manage grievances brought to its attention;
- Ensuring that the resettlement unit has the resources required to manage resettlement and livelihoods compensation activities.



### **13.3.1 Composition of the Resettlement Steering Committee**

The committee will have 17 members with at least 9 members required to form a quorum. The committee will be composed of representatives of the following:

- CBG and its partners (including two resettlement and compensation specialists) - 3;
- Local government administration (prefecture, sub-prefecture, commune) - 3;
- Technical services of the Guinean government (health, education, lands, agriculture) - 4;
- Affected Communities (sector heads, youth, women, elders) - 5;
- Civil society possibly including local NGOs - 2.

The committee will meet at a minimum monthly during the development and implementation of a RAP. During the monitoring phase, the committee will meet at least once a year or more frequently as required.

## **13.4 RESETTLEMENT UNIT**

CBG will put into place a resettlement unit with the following competencies:

- The application of international standards for resettlement and livelihoods compensation;
- Implementation of a RAP;
- Management of public participation processes;
- Data management;
- Agricultural development programmes;
- Management of in-kind and cash compensation programmes;
- Urban planning;
- Civil engineering and construction; and
- Other activities (to be defined by RAP).

The Resettlement Unit will report to the Resettlement Steering Committee and the management of the Expansion Project. It will undertake the following activities:

- Planning and day to day management of RAP development and implementation activities and teams;
- Follow up on compensation and resettlement files;
- Production of regular progress reports to be submitted to the Resettlement Steering Committee and Expansion Project Management;
- Management of human, material and financial resources mobilised for a RAP;
- Management of sub-contractors engaged in RAP development and implementation;
- Management and quality assurance of data related to resettlement and compensations; and
- Monitoring the implementation of a RAP.

#### **13.4.1 Composition of the Resettlement Unit**

The Resettlement Unit will have the following members:

- A resettlement manager;
- An administrative support person;
- A financial director;
- A resettlement and livelihoods restoration coordinator;
- A data manager;
- A construction manager;
- A contract manager;
- A human resources and training manager.

The Resettlement Unit will also require the support of external specialists during the development and implementation of a RAP including:

- Participation of PAPs throughout RAP development and implementation;
- Socioeconomic and asset surveys;
- Livelihoods restoration project development and implementation;
- Civil engineering and construction; and
- Monitoring and evaluation.

### **13.5 COMPENSATION COMMISSION**

The compensation commission will be responsible for the official submission of compensation contracts to Project Affected Persons. This commission will be composed of representatives of the following parties:

- The CBG Expansion Project
- CBG legal services;
- Guinean legal services (bailiff);
- Concerned communities;
- The prefecture or sub-prefecture; and
- Related Guinean government ministries.

### **13.6 COMMUNITY RESETTLEMENT COMMITTEE**

Affected Communities will form a Community Resettlement Committee charged with assuring that the interests of the community are effectively represented throughout the development and implementation of a RAP. This committee will also all RAP development activities including:

- Consultations;
- Management of complaints;
- Socioeconomic and asset surveys;
- Market studies;
- Eligibility determination;
- Establishment of compensation strategies and rates;
- Approval of a final RAP document;
- Payment of compensation;
- Management of cultural heritage resources;
- Resettlement site selection and development;
- Moves.

A Community Resettlement Committee will be comprised of the following:

- The village chief;
- A representative of elders;
- A religious representative;

- A representative of local schools;
- A representative of local health services;
- Representatives of women (with the goal of 40% female participation);
- Representatives of youth; and
- A representative of the CBG resettlement unit.

#### **13.6.1 Community Facilitator**

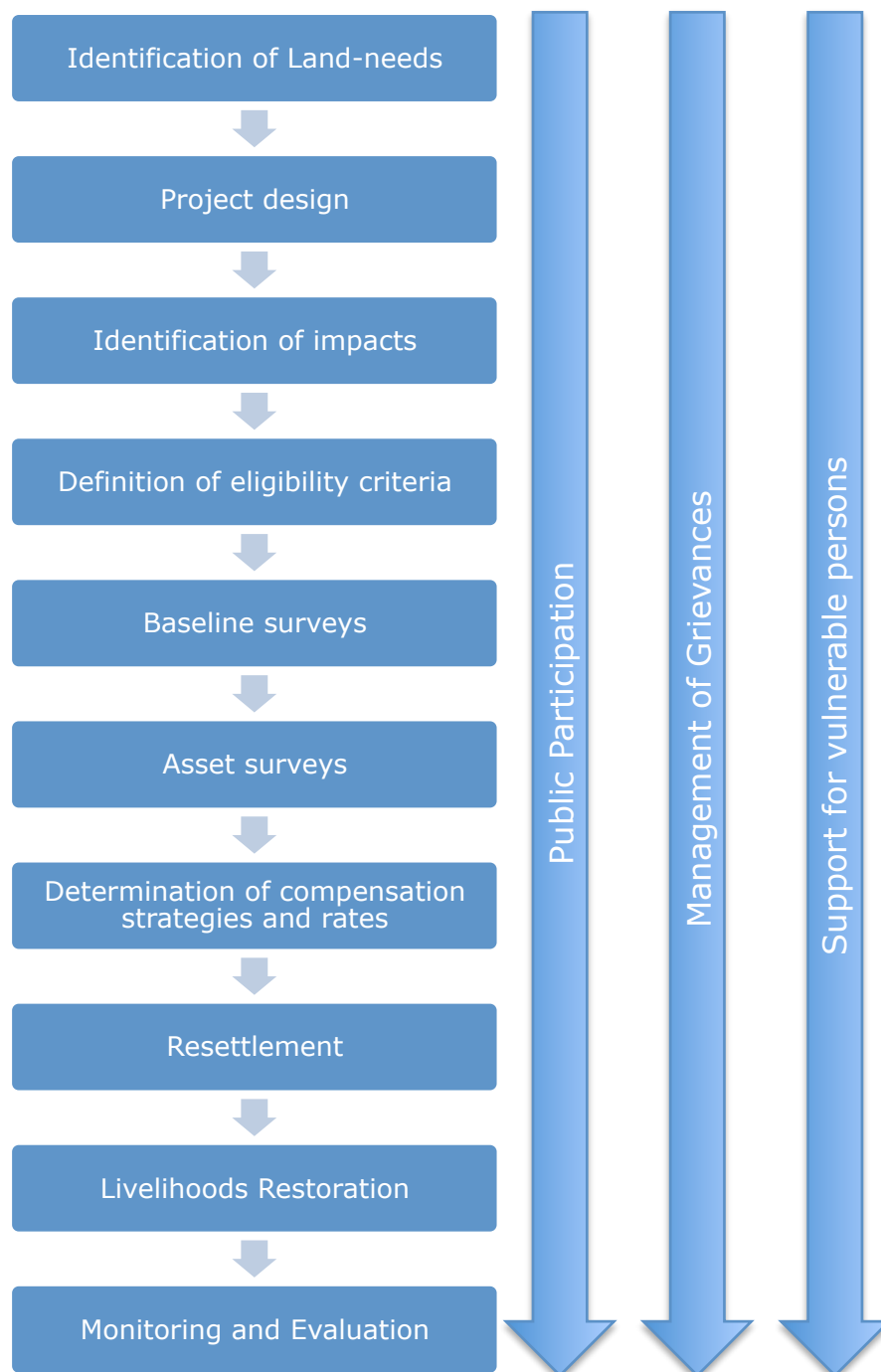
Affected Communities will also nominate a village facilitator charged with:

- Mobilising PAPs for RAP related activities including: public consultation, socioeconomic and asset surveys, contract signature and compensation payment; and
- Receiving and transmitting grievances to CBG (see section 5 ) and liaising with complainants and CBG throughout the grievance management process.

## **14 RAP PROCESS**

Figure 6 details the key steps in CBG's Resettlement Action Plan development process.

**Figure 6 – The RAP development process**



## 14.1 DOCUMENTATION

The CBG will maintain a database containing at a minimum:

- All data from socioeconomic and asset surveys;
- Compensation approaches and rates;
- Records of consultation conducted with PAPs and other stakeholders throughout the RAP process;
- Signed compensation contracts and receipts of cash payments;
- Other proofs of the completion of resettlement and livelihoods compensation activities including photos.

CBG is currently using the Boreal-IS solution for this purpose.

## 15 BUDGET SETTING

RAP documents prepared by CBG will include a budget detailing all costs associated in implementing resettlement, compensation and livelihoods restoration activities outlined in the plan. This budget will ensure that sufficient resources are dedicated to the implementation of the plan. At a minimum this budget will include the elements summarised in Table 10 below:

**Table 10 – Key Elements in a RAP Budget**


Budget Element	Components
Resettlement site development	<ul style="list-style-type: none"> <li>• Site preparation</li> <li>• Construction of housing and infrastructures</li> <li>• Demolition of the existing site</li> </ul>
Moves	<ul style="list-style-type: none"> <li>• Moving allowances</li> <li>• Transportation allowances</li> <li>• Assistance to vulnerable households</li> </ul>
Livelihoods Restoration	<ul style="list-style-type: none"> <li>• Re-establishment of existing livelihoods</li> <li>• Establishment of alternate livelihoods</li> </ul>

Training	<ul style="list-style-type: none"> <li>• Training of PAPs for reconstruction of resettlement sites</li> <li>• Training of local authorities to participate in the RAP process</li> </ul>
Compensation	<ul style="list-style-type: none"> <li>• Land</li> <li>• Infrastructure</li> <li>• Roads and paths</li> <li>• Perennial crops</li> <li>• Annual Crops and trees</li> <li>• Natural resources</li> </ul>
Per Diems	<ul style="list-style-type: none"> <li>• Statutory authorities participating in the RAP process</li> <li>• Village Facilitator</li> </ul>
External Specialists	<ul style="list-style-type: none"> <li>• Mobilisation of PAPs</li> <li>• Socioeconomic and asset surveyors</li> <li>• Livelihoods restoration experts</li> <li>• Civil engineering and construction experts</li> <li>• Monitoring and evaluation specialist</li> </ul>

## APPENDICES

### **Appendix 9.15 Grievance management**



	<b>HSEC MANAGEMENT PROGRAM</b>	Document No.: CBG_HSEC_PRO_5060 Version: 1 Issue Date: 01/09/2015 Review Date: 31/08/2018
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# GRIEVANCE MECHANISM PROCEDURE

## DOCUMENT APPROVAL

POSITION	NAME	SIGNATURE	APPROVAL DATE
Originator	Mohamed Talhaoui		
Manager / Verification	Abdoulaye Ablo Diallo		
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Document Owner	Mohamed Talhaoui		

## AMENDMENTS


ISSUE	PAGE	DATE	DETAILS OF AMENDMENT	MAJOR / MINOR

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--	--------------------------------	--

## **TABLE OF CONTENTS**

1	PURPOSE .....	3
2	SCOPE .....	3
3	RESPONSIBILITIES .....	3
3.1	Resettlement, Compensation and Complaints Management Coordinator .....	3
3.2	Director of Hygiene, Safety, Environment & Communities .....	4
3.3	Sector Community Coordinator .....	4
3.4	Contractors .....	4
4	PROCEDURE .....	5
4.1	Receiving complaints and community process.....	6
4.2	Complaint Registration .....	6
4.3	Preliminary review .....	6
4.4	Meeting with the plaintiff .....	7
4.5	Processing and analysis of the complaint .....	7
4.6	Closing and monitoring of the complaint.....	8
5	DEADLINE FOR COMPLAINT HANDLING .....	8
6	COMPLAINTS DATABASE.....	9
7	CONCLUSION .....	9
8	REGISTRATIONS .....	9


---

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## 1 PURPOSE

The objective of this grievance mechanism procedure is to provide a mechanism for ensuring the receipt, recording, classification and treatment within a defined period of all claims made in connection with the Project and the on-going operations of CBG and to be the basis for the development of the strategy for the application of appropriate corrective measures.

The specific objectives are:

- To establish a mechanism for responding to complaints clearly, in full transparency while respecting cultural differences;
- To develop a complaints management procedure available, effective and transparent, against the Project or the operations of CBG;
- To facilitate dialogue and open communication with the public;
- To manage rumours and / or negative perceptions towards the Project and CBG;
- To establish a system of investigation, response and conflict resolution;
- To minimize the number of disputes with respect to the Project and CBG;
- To improve the social performance of CBG in terms of complaints evaluation;
- To implement appropriate remedial measures;
- To comply with the IFC - Performance Standard No. 1 and No. 5.

## 2 SCOPE

This procedure applies to all communities (including legal entities), local businesses and other stakeholders. The procedure will be available to all those living or working in the area of influence around CBG and its activities including the sub-prefectures of Kamsar, Kolaboui, Boke, Tanéné, Sangarédi, Daramagnaki, Missira, Weidou Mbour, Koumbia. Complaints from suppliers about commercial issues relating to contracts should be addressed to the Directorate for Logistics and processed according to their procedural treatment of trade complaints

## 3 RESPONSIBILITIES

### 3.1 Resettlement, Compensation and Complaints Management Coordinator

The coordinator for resettlement, compensation and grievance management (CRCGM):


- Will ensure the implementation of the complaints management procedure. He/She will be supported by the Superintendent for Community Relations (SCR) and the liaison officers;
- Periodically, he/she will report the information to stakeholders about the complaints management mechanism and its use with the surrounding communities;
- With the support of his/her team, he/she will obtain, organize and document on a weekly basis different perceptions, issues and requests from stakeholders;
- Will evaluate and transmit the feedback obtained from stakeholders to CBG Directions or to involved contractors, if applicable;
- Will manage all aspects of the deployment and implementation of the mechanism of complaints management, monitoring and evaluation;
- Will oversee, with the Department of contracts, contractors in relation to the complaints management mechanism.

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### 3.2 Director of Hygiene, Safety, Environment & Communities

The Head of HSEC performance of CBG must consider the potential complaints when establishing mitigation measures and monitoring relating to health, safety and the environment in coordination with the CRCGM.

### 3.3 Sector Community Coordinator

The Sector Community Coordinators, or also called "liaison officers" are responsible for:

- To receive complaints;
- To enter the complaint in the mechanism;
- To notify and refer the complaint to the CRCGM;
- To keep the register of complaints, organize and document each complaint;
- To prepare and submit a weekly report to the CRCGM;
- To propose complaint resolution tips in coordination with the CRCGM and contractors;
- To report answers approved by the CRCGM to the complaining parties;
- To assess and ensure compliance with the process established for the management of complaints;
- To act as the interface with communities through meetings or other means of approach in order to receive complaints;
- To set up a local committee complaints management in the targeted communities.

In addition, liaison officers, in collaboration with the CRCGM, establish contacts with the communities involved, will maintain them and be responsible for:

- To establish and maintain positive relationships and communications with members of local communities;
- To develop relationships with NGOs in the area and seek to develop synergies for Social Development;
- To serve as a single contact point for receiving complaints and resolve them as soon as possible, as far as possible;
- To assess the complaints management process;
- To manage and respond to minor complaints on the spot (including documenting them);
- To ensure the registration and documentation of complaints;
- To serve as communication channel for satellite antennas;
- To issue conclusions and responses to the communities involved.

### 3.4 Contractors

CBG must take responsibility for its operations and its impact on the stakeholders, as well as contractors of CBG that also have specific responsibilities:

- The contractors must be familiar with the complaints management mechanism. This includes their participation in the notifications of complaints and their assistance in the development and the implementation of mitigation means;
- Contractors may receive a complaint from a member of local communities, an employee or a subcontractor. These complaints must be reported to the CRCGM;


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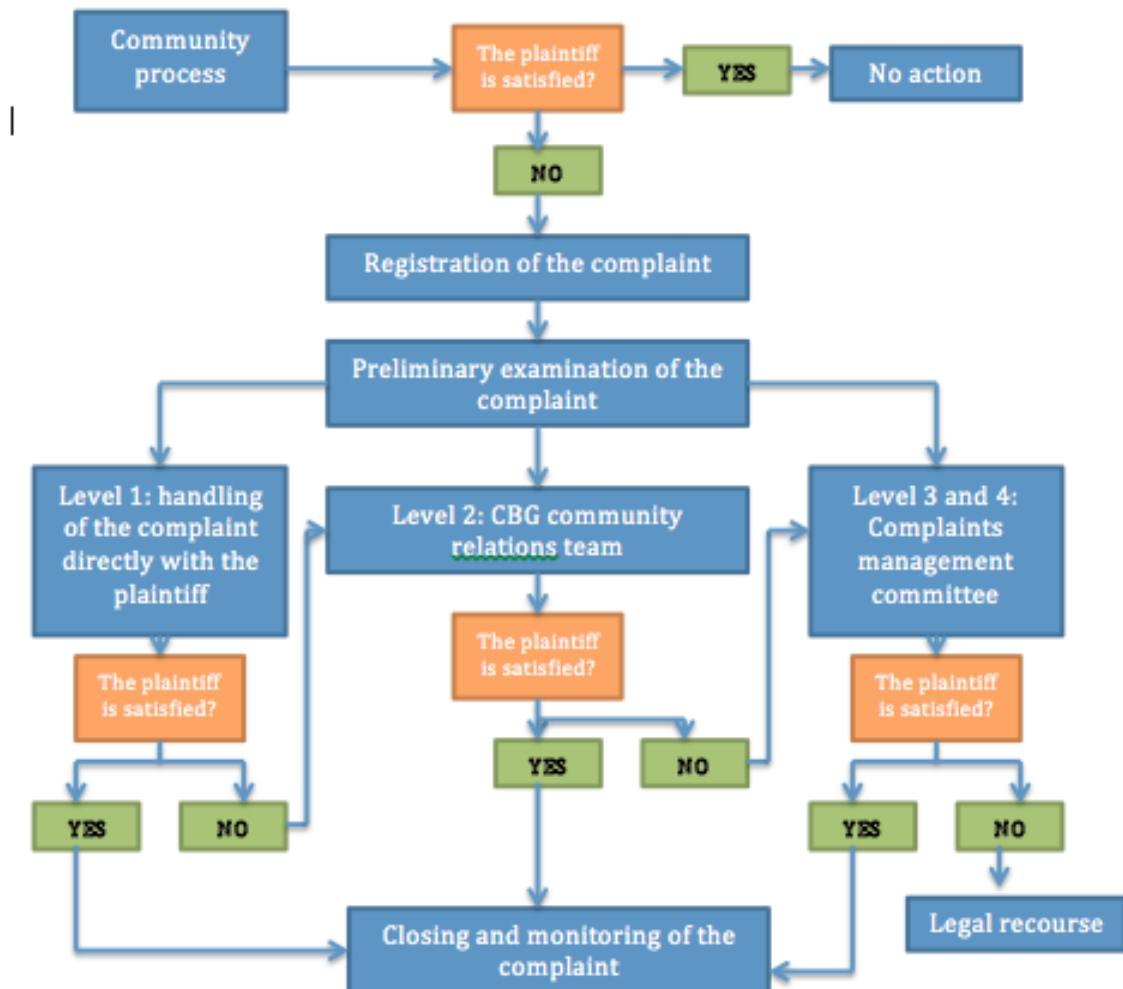
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- Contractors must propose mitigation measures associated to the impacts they cause to relevant stakeholders;
- Contractors cannot resolve complaints or have direct agreements with one or more members of the communities concerned without first coordinating these interventions with the CRCGM who must ensure that the dispute has been documented in accordance with the management procedure of complaints;
- Each contractor must designate within its staff a person interfacing with the CBG community relations team;
- Contractors must report periodically, at least monthly and immediately if an incident occurs, information to the CRCGM about the complaints process and its use with the surrounding communities.

## 4 PROCEDURE

**Figure 1 Complaints Processing Diagram**




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## 4.1 Receiving complaints and community process

CBG must communicate extensively with affected communities about the existence of this mechanism. Collective complaints of a superior level to the district's level (Communal or inter Communal) may be filed directly to the complaints office on the same terms.

The first action to take concerning complaints should help stabilize the situation so that problems do not get worse. The plaintiff will meet the liaison officer or any person of the project and issues a verbal complaint if there's danger of worsening. The officer or employee has a duty to stop the root cause of the problem and notify his/her superiors.

To formalize the reception of the complaint, it will have to be transcribed into the "incident report form" and in the dispute notification form.

## 4.2 Complaint Registration

The liaison officer or any employee of the project receives the plaintiff's verbal complaint and drafts it as closely as possible. The complaint is read to the plaintiff who must sign it. The written complaint includes the following information: the name of the plaintiff, the plaintiff's phone number, the name of the officer who drafted the complaint, the date, time and location of the complaint, the description of event and the proposed solution(s).

The CRCGM will ensure that each file has an unique registration number and that a monitoring and the establishment of mitigation measures are carried out.

The following information must appear in the register of complaint:

- The date the complaint was received;
- Name of the person who received the complaint;
- The contact of the affected party;
- Level of the complaint;
- Date on which the implementation of measures begins and ends;
- Date of resolution of the complaint;
- Date for which the plaintiff's notifications are sent to the plaintiff.

Note: Only under special circumstances CBG will consider an anonymous complaint.

## 4.3 Preliminary review

The complaint is classified according to its severity for processing by the community, the Project and possibly by the Steering Committee of CBG.

The degree of importance of the complaint will be evaluated according to its scale (individual, village, communal, etc.), and according to severity criteria (incomprehension, small-scale damage, serious injury, etc.). Depending on the urgency and the degree of importance of the complaint, the


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--	--------------------------------	--

CRCGM will seize the competent internal services to evaluate the complaint. Generally, he/she will study the level of severity of the complaint and systematically assess the reasons involved.

**Table 1 - Complaints classification tool**

Level	Description and severity index of the complaint
1	Isolated complaint without impact on CBG and the Community
2	Repeated complaint, with limited impact on CBG and the Community
3	Isolated complaint, with a major impact on the Community or CBG
4	Repeated complaint, with a major impact on CBG or the Community

The complaint is forwarded to the Complaints Officer who emits within 48 hours an acknowledgment of receipt to the plaintiff, including the registration number, date of registration, a copy of the written complaint and the name of the person assigned to the complaint case or in charge of complaints.

#### 4.4 Meeting with the plaintiff

The complaints officer goes on site within seven days to make an assessment and recommends a solution to the complaint. The plaintiff may sign the recommendation if he/she agrees with it but it is not mandatory.

#### 4.5 Processing and analysis of the complaint

The liaison officer receiving the complaint will proceed by following these steps:

##### ❖ Level 1

At level 1, the complaints officer addresses the complaint on the spot, directly with the plaintiff.

##### ❖ Level 2

The CBG community relations' team addresses the complaint.

##### ❖ Level 3 and 4

The liaison officer will communicate and explain the complaint to CRCGM. Eventually the CRCGM will discuss the case with the other departments involved and / or contractor. Subsequently, the people involved at CBG will determine possible corrective actions and mitigation measures. The nature of the corrective action, the deadline for completion and the name of the person responsible for its realization must be registered in the register of the complaint.


As soon as a solution is agreed on, the information must be returned to the plaintiff. Furthermore, the plaintiff must be able to know at what level is the complaint at any time by consulting a facilitator (liaison officer or member of the local committee for complaints management).

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--	--------------------------------	--

The liaison officer and / or facilitator, so that he/she can maintain his/her role as a facilitator, should not participate in the handling of the complaint. His/her role is strictly limited to the communication and the transmission (and the registration) of information in both directions.

#### ❖ Legal recourse

When all appeals have been exhausted the complaint would be sent to court. At that time, the plaintiff may request support for access to a lawyer's service to continue the procedures for the settlement of the complaint. A lawyer will be chosen by the plaintiff from a selection of ten lawyers duly recognized and accredited by the Minister of Justice and an independent accredited support NGO by the stakeholders during the formulation of the Project.

## 4.6 Closing and monitoring of the complaint

The structure that handles the complaint makes its recommendation within 15 days, and transmits it to the plaintiff for approval via a complaints officer or liaison officer. Following the approval of a solution, the complaints officer requires the approval of the plaintiff, the corrections from the decision-making bodies, and ensures their expeditious implementation.

The liaison officer must visits the affected parties within a period of 20 to 40 days after the implementation of corrective actions to ensure that the situation has been adequately resolved to the satisfaction of all involved parties. Monitoring can be performed on a regular basis depending on the nature of the situation. Follow-ups should be recorded in the register of the complaint. Following the implementation of the agreed solution, the plaintiff signs the closing of the complaint.

## 5 DEADLINE FOR COMPLAINT HANDLING

So that the system is operational, it is imperative that the complaints deadlines are short and respected. The table below gives the maximum indicative deadlines for the handling of complaints from their filing until they are closed.

These deadlines are given for a linear handling (ie no appeal and no referring the case back to a previous step during processing). If they are not to be exceeded, it is possible to perform the entire process in a shorter period.

**Table 2 –Maximum complaints processing time**

Step and action	Complaints processing time expressed in days	
	Level 1 & 2	Level 3 & 4
Filing of the complaint	0	0
Registration	0	0
Preliminary examination and classification	7	7
Constitution of the audit file	10	15
Process definition	10	20
Moderation	15	30
Arbitration	N/A	30
Corrective action	15	40
Monitoring of the complaint	20	45
Closing	30	50


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## 6 COMPLAINTS DATABASE

The complaints database must be updated weekly by the CRCGM. This database should be a tool to quickly find individual records and allow the sorting of files by date received, closed, etc. The database must specify where the conflict has been resolved and must contain a signed satisfactory comment of the plaintiff on the handling process of the dispute. The files for which no agreement was able to satisfy both parties must be specified in the database and analysed by a third party (e.g. the prefectural arbitration committee).

## 7 CONCLUSION

Each complaint will be subject to a specific process adapted to local communities. This is one of the requirements of international standards. To effectively handle each complaint filed, this process will include several steps, as described in the previous sections. Several objectives will be achieved through this process including the resolution of disagreements in the context of resettlement.

Different types of complaints will be considered and various bodies and people will get to be involved in the process to ensure its smooth running. It will also be about maintaining independence in the registration of complaints. The deadlines for each step were estimated in order to respond appropriately and as quickly as possible to complaints.

## 8 REGISTRATIONS

Document Number	Description	Archive Period
CBG_HSEC_ENR_1000	Incident Reporting Procedure	
CBG_HSEC_ENR_1111	Incident Report Form	
CBG_HSEC_ENR_5061	Dispute Notification Form	

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## APPENDICES

### **Appendix 9.16 Stakeholder engagement**



**EEM**

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# **CBG Report**

## **STAKEHOLDER ENGAGEMENT PLAN**

DECEMBER 4, 2013

ENGLISH TRANSLATION SEPTEMBER 2015

PROJECT NUMBER: 13EAO039

**FINAL REPORT**

**Prepared for**

Compagnie des Bauxites de Guinée

# TABLE OF CONTENTS

<b>1 INTRODUCTION .....</b>	<b>1</b>
<b>2 BACKGROUND .....</b>	<b>1</b>
<b>3 METHODOLOGY .....</b>	<b>2</b>
<b>4 THE OPERATOR AND ITS SUPPLIERS.....</b>	<b>4</b>
4.1 THE EXPANSION UNIT .....	4
4.2 GENERAL ORGANIZATION OF CBG .....	5
4.3 CBG'S EXISTING COMMUNICATION STRATEGY .....	6
4.4 CBG DEPARTMENTS INVOLVED WITH COMMUNITIES.....	7
4.4.1 Administration .....	7
4.4.2 Finance .....	8
4.4.3 Human Resources.....	9
4.4.4 Health, Safety and Environment (HSE) .....	10
4.4.5 The "Gare au train" project.....	10
<b>5 OTHER STAKEHOLDERS .....</b>	<b>11</b>
5.1 NATIONAL .....	11
5.1.1 The BGEEE .....	11
5.1.2 Government social services.....	12
5.2 REGIONAL .....	12
5.3 PREFECTURAL .....	12
5.4 SUBPREFECTURAL .....	13
5.4.1 Sangarédi subprefecture .....	13
5.4.2 Tanéné subprefecture .....	14
5.4.3 Kolaboui subprefecture.....	14
5.4.4 Kamsar subprefecture .....	14
5.5 MUNICIPAL .....	15
5.5.1 Sangarédi CR.....	15
5.5.2 Tanéné CR.....	15
5.5.3 Boké CU.....	16
5.5.4 Kolaboui CR.....	16
5.5.5 Kamsar CR .....	17
5.6 CIVIL SOCIETY ORGANIZATIONS .....	17
5.7 NGOs.....	17
5.8 DISTRICT COUNCILS, ELDERS COUNCILS AND MOSQUE COUNCILS .....	18

5.9	WOMEN.....	19
5.10	UNIONS.....	19
5.11	SUBCONTRACTORS .....	19
5.12	MICROENTERPRISES (MB) .....	20
<b>6</b>	<b>SEP OBJECTIVES .....</b>	<b>20</b>
<b>7</b>	<b>PROVISIONS FOR SEP IMPLEMENTATION .....</b>	<b>21</b>
7.1	INTERNAL COMMUNICATION .....	21
7.2	EXTERNAL COMMUNICATIONS STRATEGIES .....	22
7.2.1	System for local and community-level communications.....	23
7.2.2	Discussion forum for intercommunal communication .....	25
7.2.3	Dialogue with the government.....	26
7.3	STAKEHOLDER MANAGEMENT PLAN FOR THE ESIA.....	28
7.3.1	Identification of stakeholders .....	29
7.3.2	Disclosure of relevant information.....	31
7.3.3	Stakeholder consultations.....	32
7.3.4	Documenting stakeholder engagement activities.....	33
7.3.5	Environmental and social management plan (ESMP).....	34
7.4	GRIEVANCE HANDLING MECHANISM .....	34
7.4.1	Approach .....	34
7.4.2	Mechanism .....	35
7.4.3	Complaint processing timelines .....	38
7.5	MONITORING AND EVALUATION MECHANISMS.....	39
7.6	COLLABORATIVE EFFORTS FOR SOCIAL ACTION .....	40
7.6.1	Use of business revenue taxes and equity funding .....	40
7.6.2	Water and electricity management.....	41
7.6.3	Shared use of resources and harmonization of practices .....	41
<b>8</b>	<b>RESOURCE MOBILIZATION.....</b>	<b>42</b>
<b>9</b>	<b>CALENDAR FOR STAKEHOLDER ENGAGEMENT PLAN.....</b>	<b>43</b>
<b>10</b>	<b>CONCLUSION .....</b>	<b>44</b>

## **APPENDICES**

---

APPENDIX 1: List of stakeholder consultations

APPENDIX 2: Organization chart for consideration

APPENDIX 3: Prefectural committee proposal on monitoring mining activities

APPENDIX 4: Sample indicators

APPENDIX 5: Map of study area within the mining concession

APPENDIX 6: Key stakeholders

APPENDIX 7: Consultation data input form

APPENDIX 8: Risk analysis matrix

## **LIST OF FIGURES, TABLES AND MAPS**

---

### **Figures**

Figure 4-1: CBG Expansion Project organization chart .....	5
Figure 4-2: CBG organization chart .....	6
Figure 7-1: Diagram of complaint handling process.....	36

### **Tables**

Table 7-1: List of stakeholders by main issues.....	30
Table 7-2: Complaint classification tool .....	37
Table 7-3: Maximum timelines for handling complaints.....	39
Table 8-1: Mobilization of human resources .....	42
Table 8-2: Provisional budget for first year .....	42
Table 9-1: Provisional timetable for launching the SEP.....	43

### **MAPS**

Map 3-1: Project influence zones .....	3
--	---

## **ABBREVIATIONS AND ACRONYMS**

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(Note: Text in square brackets [] is a translation of a French term for which there is no official English version.)

<b>AIP</b>	Annual investment plan
<b>AMC</b>	Alliance Mining Commodities
<b>ANAIM</b>	Agence Nationale Investissements Miniers [national mining investments agency]
<b>APAE</b>	Association des Parents et Amis d'Elèves [association of families and friends of students]
<b>BGEEE</b>	Bureau Guinéen des Etudes et Evaluations Environnementales [Guinean bureau of environmental studies and assessment]
<b>CBG</b>	Compagnie de Bauxite de Guinée
<b>CDF</b>	Centre de Développement et de Formation [development and training center]
<b>CECIDE</b>	Centre du Commerce International pour le Développement [International center for trade and development]
<b>CFB</b>	Chemin de fer de Boké [Boké railroad]
<b>CoPSAM</b>	Comité Préfectoral de Suivi des Activités des Miniers [prefectural mining activity monitoring committee]
<b>CPD</b>	Comité Préfectoral de Développement [prefectural development committee]
<b>CR</b>	Commune Rurale [rural commune]
<b>CSO</b>	Civil society organization
<b>CSR</b>	Corporate social responsibility
<b>CU</b>	Commune Urbaine [urban commune]
<b>DPUHC</b>	Direction Préfectorale de l'Urbanisme de l'Habitat et de la Construction [prefectural urban development, housing and construction department]
<b>EDG</b>	Electricité de Guinée [Guinea's electric power company]
<b>EITI</b>	Extractive industries transparency initiative
<b>ESIA</b>	Environmental and social impact assessment
<b>ESMP</b>	Environmental and social management plan



<b>FTC</b>	Fixed-term contract
<b>GAC</b>	Global Alumina Corporation
<b>GNF</b>	Guinean franc
<b>GPS</b>	Global positioning system
<b>HSE</b>	Health, safety and environment
<b>ICP</b>	Informed consultation and participation
<b>IFC</b>	International Finance Corporation
<b>LDP</b>	Local development plan
<b>ME</b>	Microenterprise
<b>MME</b>	Ministère des Mines et de l’Energie [ministry of mines and energy]
<b>MTPA</b>	Million tonnes per annum
<b>na</b>	Not applicable
<b>NGO</b>	Non-governmental organization
<b>OEC</b>	Open-ended contract
<b>PACV</b>	Programme d’Appui aux Organisations Villageoises [village organizations support program]
<b>PRCB</b>	Projet de Renforcement des Capacités de Boké [Boké capacity-building project]
<b>PS</b>	Performance standard (IFC)
<b>RAP</b>	Resettlement and compensation action plan
<b>SEG</b>	Société des Eaux de Guinée [Guinea’s water supply company]
<b>SEP</b>	Stakeholder Engagement Plan
<b>SH</b>	Stakeholder
<b>SP</b>	Subprefecture
<b>TOR</b>	Terms of reference
<b>TT</b>	Turnover tax

# 1 INTRODUCTION

A Stakeholder Engagement Plan (SEP) is a tool that defines and qualifies relations between those involved in a project at different levels, from design to execution. The relations that exist or should exist differ depending on the roles played in the project or the way the project impacts a stakeholder (SH). To begin with, the SEP sets out how communication with stakeholders should take place, that is, the communication levels, channels and media. Some relations are legally or officially regulated, others are contractual. Rather than spelling out each of these, the SEP makes it possible to identify the actors and the general terms and conditions of their relations given the national legal framework and international recommendations. However, the main objective of the SEP is to build sound, long-lasting relations between all concerned.

This SEP was developed and approved by CBG in the fall of 2013, when the environmental and social impact assessment (ESIA) for the CBG Expansion Project was just getting underway. Since that time, a number of the recommendations in this report have been implemented, including the following:

- restructure the Community Relations department;
- hire new employees for the Community Relations department;
- develop a complaints management procedure.

In addition, CBG has adopted an SEP for its mining operations (cf. Procedure for Stakeholder Engagement Management Plan - CBG\_HSEC\_PRO\_5020 Version 1, 01/07/2015).

# 2 BACKGROUND

The Compagnie des Bauxite de Guinée (CBG) has been operating in Guinea, in the Boké and Téliélé prefectures, for 50 years. CBG signed its first mining agreement with the Government of Guinea in 1963 and will celebrate 40 years of mining operations in 2013.

The Government of Guinea holds 49% of the shares of CBG, and the Halco Mining consortium holds 51%. Halco Mining is 45% held by Alcoa, 45% by Rio Tinto Alcan and 10% by DADCO.

The Expansion Project for which this SEP was requested calls for a two-stage increase in bauxite production: an increase from the current 13.5 MTPA to 22.5 MTPA in 2017 and a further increase to 27.5 MTPA in 2022, the final objective. These increases will require an intensification of activities in the southern part of the concession (south of the Cogon River). The Project has four main components:

- The mine (zone 1): enlargement of the mine footprint; acceleration and increase in production from the current 13.5 MTPA; increase in mining machinery and in the capacity of the rail yard.
- The port (zone 2): widening and lengthening of the shipping channel; addition of another bauxite loading quay;
- The plant (zone 2): modification of the dumper system (from ground level to an underground belt conveyor); increase in dried ore stockpiling capacity; increase in energy generation and fuel storage capacity; improvement in dust filtering during drying; enlargement of train maintenance shops; and installation of a new crusher.
- The railroad (zone 3): doubling of volumes shipped, and hence doubling of train traffic. Work on the railroad is required, particularly at the sites of two sidings (1.8 km each) as well as at a site where work is currently taking place.

These Project components will thus affect part of the city of Kamsar and its immediate surroundings (Taïgbé, mouth of the Rio Nuñez, Taïdy), the communes and villages along the railroad (especially along the sidings) and the mining area. Impacts will probably be most intense in the concession. Particular attention must also be paid to the villages in the Project footprint and the city of Sangarédi.

### 3 METHODOLOGY

The mission relied on discussions by interest groups within the population in the study area (around Kamsar and Sangarédi). The discussions centered on relations with CBG and knowledge of the Expansion Project.

Some of the groups consulted were formally constituted (official civil society organizations or youth associations, for example), whereas others were informal (groups of young people, for example).

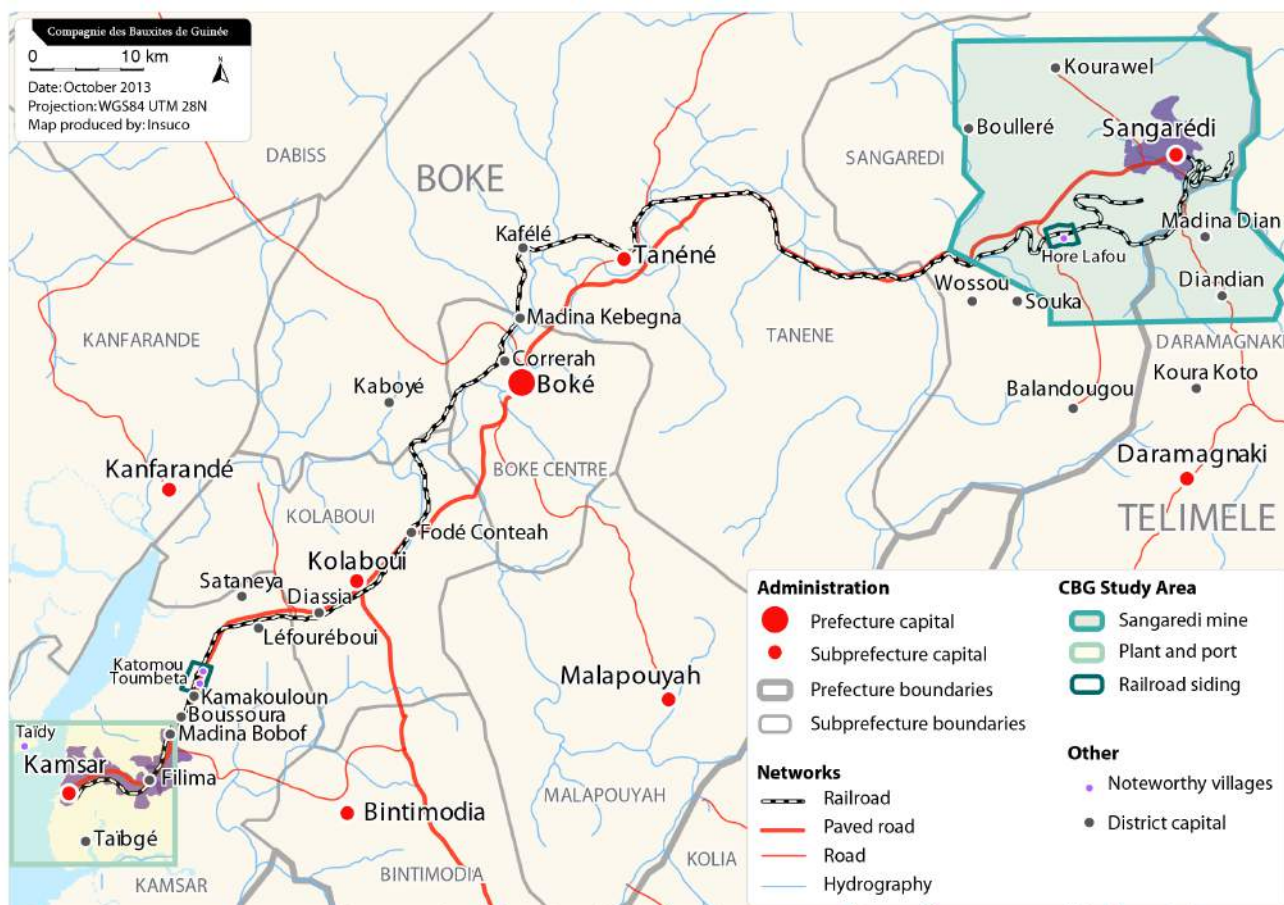
Traditional authorities (elders councils, mosque councils) were also included, even though the members of these councils are also part of other economic interest groups consulted. We believe that by speaking to these different groups

we were able to have real exchanges, locally, with the largest number of people at all levels of society.

Subprefecture and prefecture administrations were contacted directly and involved in the development of the SEP. Meetings were also held with the Boké regional authority (Télimélé prefecture is in the Kindia administrative region, but we were not able to travel to either the regional or the prefecture capital during this first visit) and with deconcentrated services.

Last, managers or staff from various CBG departments were consulted to obtain a wide range of viewpoints and to understand their perception of a dialogue-based engagement plan.

We met more than 500 people in approximately 180 villages in the project influence zones during this mission.



**Map 3-1:** Project influence zones

Appendix 5 includes a more detailed map of the study area in the concession.

Some of the main objectives of the meetings were as follows:

- to identify and list Expansion Project stakeholders;

- to assess the existing level of communication between the CBG and stakeholders;
- to assess how well-informed stakeholders are about the Expansion Project;
- to identify the main expectations/concerns with respect to stakeholder engagement and communication.

The broad lines of an SEP were developed by comparing what CBG now does or has planned for its ongoing activities and the Expansion Project with what was observed on the ground.

Ideally, our findings should be shared in the upcoming phases of the Project with the different stakeholders identified and met. This second series of consultations could be used to launch the SEP and consolidate the stakeholder engagement strategy described herein.

This SEP focuses on engagement at the local level. Some recommendations on launching the Project and on the study validation process are also included in the document addressing national-level concerns.

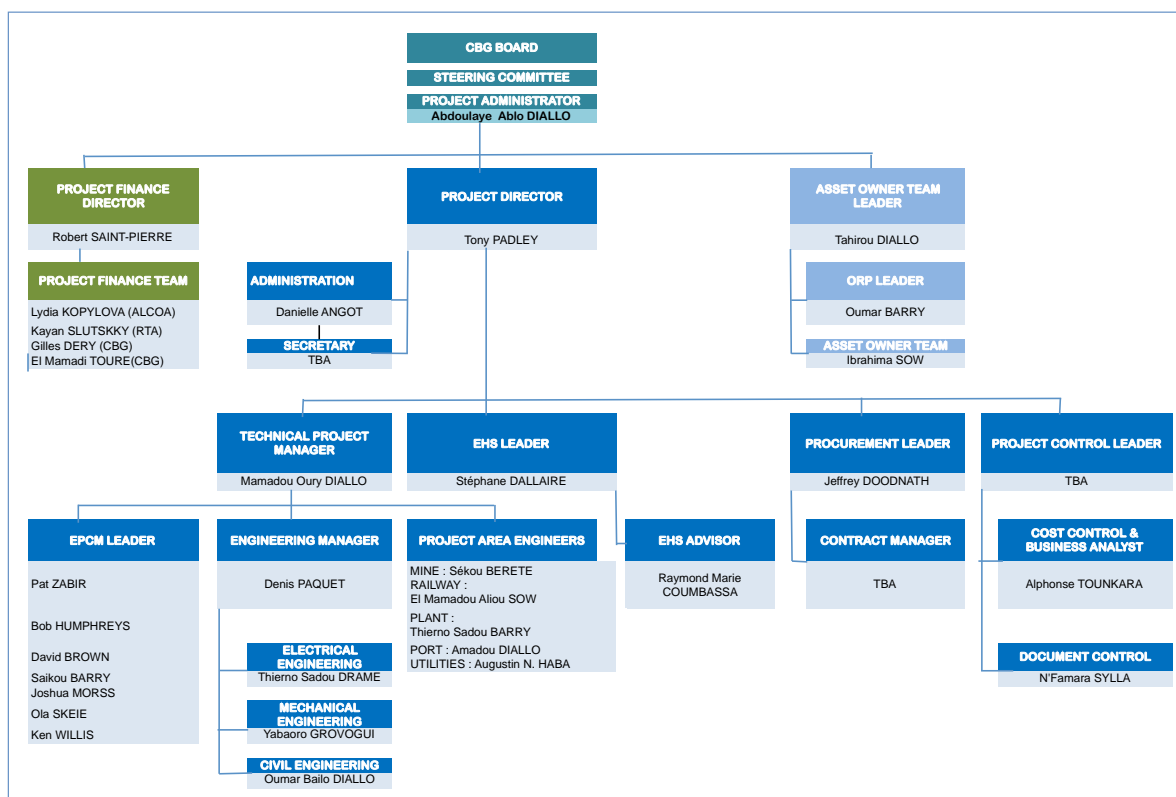
## **4 THE OPERATOR AND ITS SUPPLIERS**

CBG has been active in Guinea for 50 years. It has well-established facilities in Kamsar and Sangarédi and employs a large workforce. Everyone is aware of its activities.

### **4.1 THE EXPANSION UNIT**

A special unit has been established for the Expansion Project. This unit is dedicated to increasing production in the Project area, as described above.

This unit has not yet been completely integrated into CBG's organization chart and has its own pattern of working.



**Figure 4-1:** CBG Expansion Project organization chart

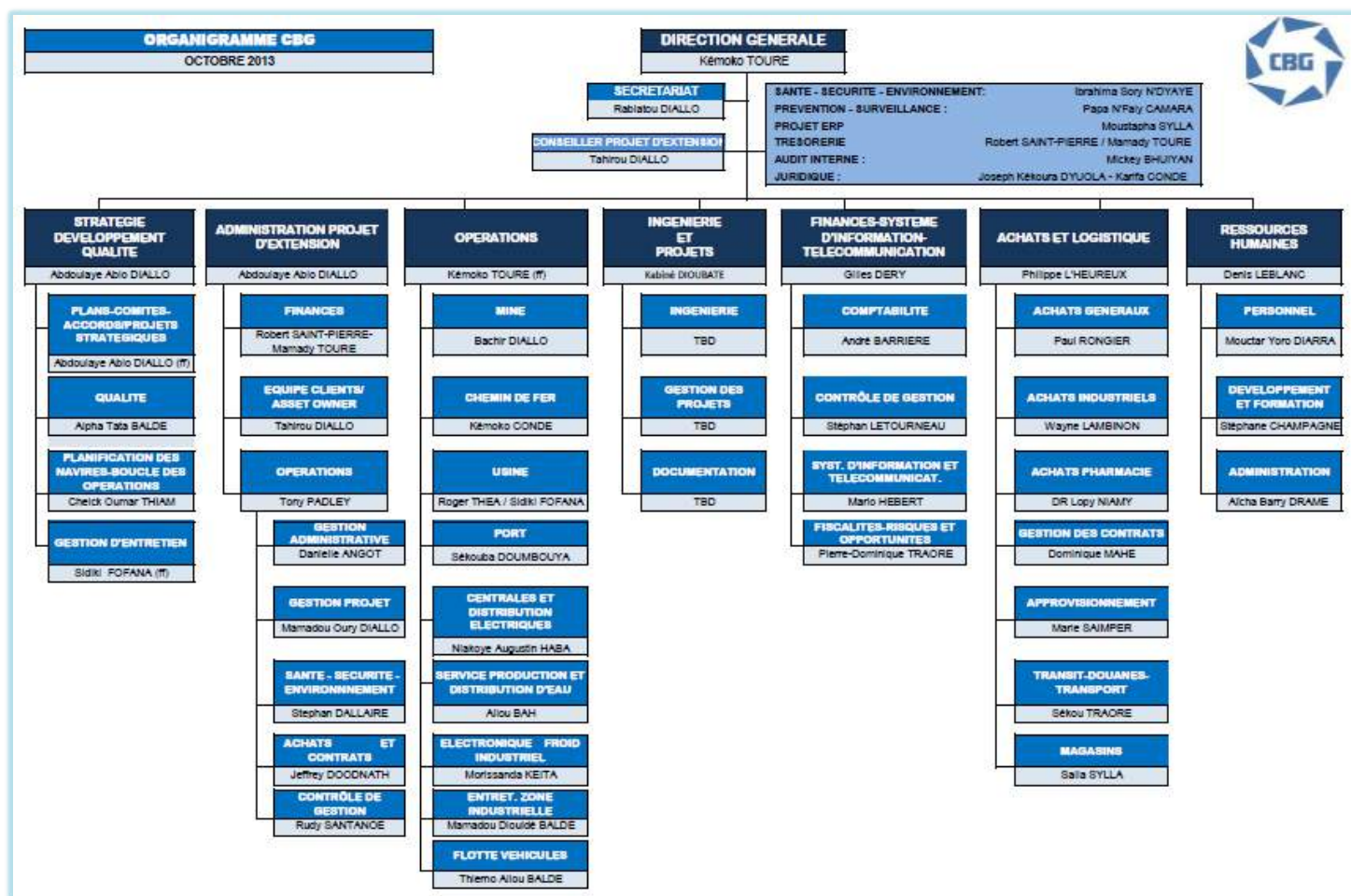
While communication was easily established with the members of this new unit, it was harder to navigate the complex communication processes of CBG's older departments.

These departments operate within a well-entrenched hierarchical structure, and it is not always possible to easily obtain information or meet with members of different departments.

## 4.2 GENERAL ORGANIZATION OF CBG

CBG has a complex structure developed over its more than 40 years of activities. General management is based in Kamsar, as are the main administrative bodies. Management of the mine at Sangarédi is relatively independent.





**Figure 4-2: CBG organization chart**

In addition to the different departments listed above, the Community Projects department should be listed under Human Resources, Administration. The main CBG departments in contact with communities or other stakeholders are described below.

### 4.3 CBG'S EXISTING COMMUNICATION STRATEGY

CBG is currently working on a communication charter. As this charter has not yet been validated, we were unable to obtain it. However, we were nonetheless able to get a good idea of the existing internal as well as external communication strategy through conversations with the head of the Communication department.

Internal communication relies on two main tools: the CBG intranet, to which all employees connected to a computer have access; and a quarterly news bulletin, 1,000 copies of which are distributed internally and to CBG's main partners.

External communication consists mainly of radio broadcasts. CBG has its own radio station in Kamsar (and an office in Sangarédi), but it is used more for

awareness purposes than for information, and the information aspect could be strengthened.

Letters are used for official communication with the governorate and the prefecture. Visits are occasionally organized, when necessary.

There is no real framework for regular discussion with stakeholders. A mechanism of this sort existed in the past in Sangarédi but seems to have been abandoned.

The Community Projects and HSE departments are not directly involved in communication.

## **4.4 CBG DEPARTMENTS INVOLVED WITH COMMUNITIES**

### **4.4.1 Administration**

Reporting to Administration, in addition to the usual services, are the Community Projects and Communication departments.

The Communication department works mainly in Kamsar. It is responsible for Radio CBG (which has an agent in Sangarédi) and it has a television studio that it uses occasionally to make video clips.

The radio is CBG's main information vector to the people in the company's area of operation (and beyond, as it can be heard up to 150 km away depending on the topography).

The Community Projects department is located in Kamsar only and has no presence in the mining areas. The department's action strategy focuses on the following:

- Building community infrastructure in the 12 communes affected by CBG operations (ten in Boké and two in Téliélé): Construction of this infrastructure is financed by CBG equity funding and by the turnover tax for the communes of Kamsar, Kolaboui, Boké and Sangarédi. It is not a turnover tax properly speaking but rather a fixed amount distributed to the four communities since the 1990s at the request of the government: annual amounts are 50 million Guinean francs (GNF) for Kamsar, 90 million GNF for Boké, 25 million GNF for Kolaboui and 35 million GNF for Sangarédi.

Infrastructure is selected based on the Plans de Développement Local (PDL, local development plans) and the Plans Annuels d'Investissement (PAI, annual investment plans), or on complaints or requests for compensation sent to CBG. Consulting engineers work out the technical



details as part of a joint technical committee (Commission Technique Conjointe) together with the DPHU.

- Creation of and support for microenterprises: Business initiatives for supply of services by people in the areas affected are encouraged. The CBG supports the creation of microenterprises and awards them service contracts, mainly for cleaning and maintenance, planting/rehabilitation of mined areas and surveillance of portions of the railroad.
- Water and power supply: There are service delegation contracts for Boké from SEG and EDG. At Sangarédi, the supply of these services is theoretically managed directly by CBG, whereas at Kamsar a generator was installed for the city but is not currently in operation because there is no operator.
- Community donations and assistance: Action is taken in case of emergency or disaster.

Last, in theory every town hall has a register of complaints and satisfaction specifically for the work of CBG.

#### 4.4.2 Finance

This department is directly involved in paying for the projects and infrastructure planned or implemented by CBG.

It is also responsible for compensation payments, once they are verified by the company's legal service. Compensation may be granted when a complaint validated by a joint CR/SP/CBG commission is forwarded by a commune, once the damage has been evaluated (often by subprefectural rural development services) and the company's legal service has completed its verifications.

The Finance department includes the company's tax unit, responsible for paying the different taxes owed by CBG:

- Note that CBG is not required to pay the **surface tax** (a tax that mining companies are usually required to pay the communes for occupation of their land) and therefore makes no surface tax payments. The basic agreement concluded in 1963 did not provide for such a tax, and for a new tax to apply, both parties would have to agree to an amendment. To date, no amendments have been made.
- In principle, the **turnover tax** should not apply, because the tax amount was also fixed after the mining agreement was signed. Other agreements were nonetheless signed in the 1990s whereby the Government

consented to return a portion of the taxes it received directly to the communities.

The tax that is nominally the turnover tax is actually 2.5% of the rent paid to ANAIM (2.5% of US\$6,500,000 or US\$162,500/year). This comes to 200,000,000 GNF, distributed as follows: 90 million GNF – Boké; 50 million GNF – Kamsar; 35 million GNF – Sangarédi; 25 million GNF – Kolaboui. The exchange rate differential has been returned to the national treasury since 1990.

These provisions will remain in effect until the 20-year basic agreement expires in 2016. These amounts are not paid directly to the communities. Projects are selected by CBG, which pays selected contractors to carry them out.

- The CBG dedicates a portion of its budget (US\$500,000) to community projects. This **equity funding**, considered donations, may not theoretically exceed 1/1,000 of sales. The new finance act of 2012, however, provides for the possibility of exceeding this amount subject to compliance with standards for deductibility of taxable expenditures (tax code).

#### **4.4.3 Human Resources**

Two units are directly involved in recruiting for CBG: Personnel and the Centre de Développement et de Formation (CDF, development and training center). The recruiting process is transparent and anonymous:

- The different departments request recruitment based on their needs.
- Personnel publishes want ads and screens applications.
- Personnel selects applicants based on requirements and applicant résumés and sends a short list of applicants to the CDF.
- The CDF plans, organizes and administers assessment tests with the agreement of the department requesting new hires.
- The CDF, together with the requesting department, holds selection interviews.
- The CDF schedules medical check-ups for selected candidates. Depending on the results of the check-up, a 12-month apprenticeship agreement is signed.

- In the trades, CBG grants an apprenticeship period of about three to twelve months to applicants whose medical check-up shows they are fit for work.
- The CDF performs quarterly evaluations with the training department. An open-ended contract is signed with those who successfully complete their apprenticeship.

Recruitment procedures can vary depending on the level of worker sought. Personnel is responsible for new employee orientation, whereas the CDF is responsible for specific training and follow-up (there is a training catalog).

Access to the CDF is reserved for CBG employees and students/trainees, though there are a few rare exceptions to this rule.

#### **4.4.4 Health, Safety and Environment (HSE)**

This department coordinates the work of two units, the Health and Safety unit and the Environment unit.

At Sangarédi the two sections are headed by a single HSE Coordinator. HSE has a corporate-wide function, providing support for different management bodies in complying with HSE standards.

Among other things, HSE manages, in cooperation with the Prevention department, a major problem with theft, mainly of fuel but also of electric cable and crossties.

HSE coordinated the construction of runoff collectors in the cities of Sangarédi and Kamsar. HSE is also involved in managing household garbage collection in the city of Sangarédi.

HSE is responsible for land rehabilitation after mining ends. About 1,178 ha have been rehabilitated (natural vegetation or plantings), but so far the mining plan has not allowed for retrocession of the land to the communities. The rehabilitation is sometimes destroyed to allow mining equipment access once more or by bush fires.

HSE is often contacted and asked to participate in joint commissions on assessing damage (mining exploration and operations) to village lands and property.

#### **4.4.5 The “Gare au train” project**

A project known as the “Gare au train” project was launched to reduce the risks of train traffic accidents. There are regular radio broadcasts about safety.

Facilitators were introduced in the four communes crossed by the railroad to serve as liaisons with the CFB (Chemin de fer de Boké), which manages the railroad for CBG. The facilitators pass on information and promote awareness in schools and among those who live along the railroad.

This project seems to have had a positive impact on railroad safety: CBG reports a major drop in the number of accidents since the project was launched.

## 5 OTHER STAKEHOLDERS

### 5.1 NATIONAL

#### 5.1.1 The BGEEE

We met with the Bureau Guinéen des Etudes et Evaluations Environnementales (BGEEE, Guinean bureau of environmental studies and assessment) to talk about the Expansion Project. The BGEE was created by government order in 2011 (décret D/2011/047/PRG/SGG du 25 février 2011, sur les fonctions et attributions du Ministère de l'Environnement, des Eaux et Forêts). The main mission of the BGEEE is as follows:

- to ensure, through environmental assessments, that environmental issues are considered in national policies, planning, programs and projects, each environmental assessment to mandatorily include a scoping report, an environmental and social impact assessment, an environmental audit and public consultation;
- to objectively evaluate environmental assessments for legal compliance (laws and regulations as well as international conventions ratified by Guinea);
- to determine the nature and magnitude of dysfunction of an existing facility through external environmental audit;
- to participate in updating existing laws and developing new legislation on protection of the environment in general and environmental and social assessments in particular;
- to develop and implement guidelines, procedures and methodologies for carrying out legally compliant impact studies;
- to ensure monitoring and follow-up/evaluation of environmental and social management plans (ESMPs).

### **5.1.2 Government social services**

We observed that in the CGB operating area, the Government has withdrawn from the main public services, ensuring only the bare minimum. CBG has built most of the infrastructure and supplies much of the electricity and water in the urban centers (Kamsar, Boké and Sangarédi).

This situation, which stems from the history of the Government and the corporation, does not allow the Government to play its proper role or allow CBG to retain its appropriate role.

There is some confusion about the responsibilities of each regarding the supply of water and electricity, such that in the end neither of these services works very well, generating social discontent.

Regarding the community, educational and health facilities established by CBG, the link with Government technical services must be strengthened and the Government must ensure their proper constitution, their justification with respect to a health and school map and their proper functioning (staffing in particular).

## **5.2 REGIONAL**

The Governor is the highest regional authority, representing the Government at the regional level. We were able to meet with the Governor of Boké but not the Governor of Kindia—the only two CRs in Téliimélé prefecture (Kindia region) that are included in the CBG concession, one of which is affected by the Expansion Project.

Though CBG has excellent relations with the regional administration, it seems that little information circulates between institutions.

Regional technical services oversee deconcentrated prefectural services and are involved in committees that monitor mining projects. These aspects are addressed in the section below on the prefecture.

## **5.3 PREFECTURAL**

The CBG concession affects Téliimélé and Boké prefectures. For this SEP, consultations with Boké prefecture were possible.

There are a number of mining projects in Boké prefecture, including Rio-Tinto Alcan's KABATA project and the projects of CBG, GAC, RUSSAL, HENACHINE and AMC.

There is no body within the administrative machinery that is responsible for supervising or monitoring the activities of these different mine operators. It is generally on the initiative of an operator that a committee is formed to support or monitor some of these activities, it being understood that the operator will cover all or some of the costs of the committee.

There is a joint technical committee (Commission Technique Conjointe), created by order of the prefect of Boké (Décision du Préfet de Boké 38/P/BOK/99), which monitors selected CBG projects, depending on the PAI, but it does not play a real consulting role.

GAC and the KABATA project initiated broader and decidedly more participative committees that allow for wider consultation and eventually began to play a role in compensation and resettlement initiatives.

Last, by order of the Ministry of the Interior (4360/MATD/CAB/2013), a Comité Préfectoral de Développement (CPD, prefectural development committee) was created. On this committee sit members of civil society organizations and elected representatives of the communes of Boké prefecture. Though the committee has not yet met, it is in the process of being constituted and seven subcommittees are to be established (education, health, rural development, ethics and transparency, conflict resolution and urbanization). The committee's goal will be to find funding, advocate for the population and advise communities on development activities. How the committee will operate and what its exact role will be remain to be determined.

## **5.4 SUBPREFECTURAL**

Subprefectures are deconcentrated administrative bodies headed by a subprefect. They have technical services and theoretically oversee the territorial communities at the CR level (at present there is a subprefecture corresponding to each CR, which is not the case for the CUs).

### **5.4.1 Sangarédi subprefecture**

Sangarédi subprefecture is in the mining area and will be affected by the Expansion Project. The subprefecture has some ties with CBG in that it intervenes in cases of complaints by the population about CBG activities. Apart from this, however, there are few formal ties (occasional meetings when CBG needs the services of the subprefecture). In the past there were quarterly meetings between CBG senior management and elected representatives of the subprefecture, but this practice has been discontinued.

Of the different technical services of Sangarédi subprefecture, Rural Development is the one most involved, as it generally participates in fact-finding and assessment missions in case of damage caused by CBG. This service plays a key role in population/CBG/administration communication.

Sangarédi subprefecture (and the commune) is insistent in its request for cooperation with CBG.

#### **5.4.2 Tanéné subprefecture**

Tanéné subprefecture is the administrative body for the Tanéné CR. Its proximity to the city of Boké is an advantage in terms of infrastructure (close to Boké's social and administrative services) but also a drawback, because of strong competition from the city—which absorbs a major portion not only of social and public funding but also of the population (civil servants in particular and some of Tanéné's elected representatives actually live in Boké).

This subprefecture is crossed by the CBG railroad. Though the subprefecture has benefited from major investments by CBG, it is felt that efforts could be made to cooperate and communicate with stakeholders.

The assistant subprefect is CBG's current facilitator for the "Gare au train" project.

#### **5.4.3 Kolaboui subprefecture**

Kolaboui subprefecture is also crossed by the railroad. It has also benefited from CBG investments and feels that greater communication will help the population to understand what CBG has actually funded in the subprefecture.

#### **5.4.4 Kamsar subprefecture**

Kamsar subprefecture is located at the intersection of the city of Kamsar and the Kamsar workers' town, and this geographic position reflects its position in other ways. On the one hand, the subprefecture and its technical services have received substantial support from CBG, but on the other hand the disparity between conditions in the workers' town and the city of Kamsar continue to grow. These are concerns for the subprefecture, which is having difficulty playing its role in the rural part of its territory.

## **5.5 MUNICIPAL**

It was not possible to consult all municipal authorities affected by the Expansion Project for this SEP. In selecting which municipal governments to visit, we took into account the relative impact that the Expansion Project could have on the population, the land, etc.

### **5.5.1 Sangarédi CR**

The impact of the Expansion Project on Sangarédi CR will be substantial, as the mine will be developed on its territory.

The Sangarédi Conseil Communal (commune council) was dissolved for political reasons in 2011, and the CR has been headed by a Special Delegation since then. According to the Local Government Code, the CR has authority in the management and development of its territory. The CR prepares five-year local development plans (PDL) and associated annual investment plans (PAI). We were able to consult these PDLs and PAIs. Note that Sangarédi CR is currently the location of mining projects undertaken not only by CBG but also by GAC, CDM (Russal) and HenaChine.

Sangarédi CR recognizes that the assistance provided by CBG has made it possible for it to be what it is today. For example, the CR's buildings, built by CBG, are in good condition and well equipped. CBG supplies water and power to part of the city of Sangarédi, also a source of pride for the CR.

However, the CR is unhappy about the lack of formal communication with CBG. Though there was once a framework for cooperation, it is no longer functional. The CR would like a forum for discussion to be reestablished. The deployment of agents in the villages could improve community relations.

Last, the CR receives 35 million GNF as turnover tax annually, the amount set in the 1990s. The choice of projects that are funded is generally made by CBG, sometimes with the participation of local authorities (decentralized as well as deconcentrated).

### **5.5.2 Tanéné CR**

Tanéné CR is crossed by the railroad and is thus currently affected by CBG and will be affected by the Expansion Project. Tanéné CR does not benefit from the turnover tax.

GAC, Russal and AMC are also concerns for Tanéné CR, as these three mining companies will have different levels of impact on the CR, in particular with



respect to shipping of bauxite by rail—and by barge along the Rio Nuñez in the case of the AMC project.

The CR would like the opportunity for exchanges with these different operators. With respect to the CGB Expansion Project, the CR has concerns about safety around certain more exposed village and on the Tinguilintam bridge, where a fatal accident occurred last year.

### **5.5.3 Boké CU**

Boké CU is crossed by the CBG railroad and is thus affected by CBG. In the medium term, however, it could also be impacted by GAC, Russal and AMC.

This CU, which is more densely populated than its neighbors, benefits from some infrastructure and services—health and educational infrastructure and services in particular. Among other things, there is a vocational training center and the École Nationale des Mines et Géologie (a national school of mining and geology whose credentials are currently recognized throughout West Africa).

The CU benefits from a certain amount of electric power supplied by CBG to EDG at a preferential rate. EDG is responsible for selling the power. The lack of communication among those involved (CBG, CU, villages, EDG, Government) seems to have led to a misunderstanding which has caused tense relations (same with water, supplied by CBG and marketed by SEG).

Boké CU receives 90 million GNF annually as turnover tax, the amount set in the 1990s as is the case with Sangarédi CR.

CBG however makes major investments in the CU through community projects. According to the CU, there is not enough collaboration on procedures for managing these projects after they are handed over or on their selection based on PAIs. The role of the joint technical committee (commission technique conjointe) could be strengthened and a Comité Préfectoral de Développement (CPD, prefectural development committee) established.

### **5.5.4 Kolaboui CR**

Kolaboui CR is generally similar to Tanéné CR. It is crossed by the railroad, receives funding from CBG and has a “Gare au train” facilitator who is a member of the CR.

Security/safety is a concern for the town of Kolaboui. In addition there is a lack of communication on the part of CBG as well as the CR on joint activities.

#### **5.5.5 Kamsar CR**

Kamsar CR is in the same position as Kamsar subprefecture: there are significant positive spinoffs from CBG activities but there are also disparities between the rural and the urban parts of the CR as well as between the city and the workers' town.

Kamsar is one of four communes that benefit from turnover tax payments: the CR receives 50 million GNF annually. CBG has made major investments in the CR, which is also in more direct contact with CBG given the proximity of its offices.

The social benefits provided by CBG (water, electricity and access to ANAIM care services) are a constant concern (and claim) of the population. The management of these services is quite a challenge and the existing way of doing so does not seem to satisfy anyone.

Here again, better communication would probably help. Discussion and mediatization of findings could be considered.

### **5.6 CIVIL SOCIETY ORGANIZATIONS**

There are a great many civil society organizations in the Boké region, and there is official civil society representation in each subprefecture, with offices at the prefecture level as well.

Theoretically, these officials are elected by representatives of associations, groups, etc. They are generally called upon when there are broad debates on social issues and they sometimes participate in conflict resolution processes.

We met with the Sangarédi official, who complained about the total lack of relations with CBG despite the key role that his office can play in conflict resolution and in the awarding of contracts for work that affects the public.

### **5.7 NGOs**

There are some NGOs in the Project footprint. We met with the Centre du Commerce International pour le Développement (CECIDE) given its work with the mining industry, its commitment to corporate social responsibility (CSR) and its advocacy for the population.

CECIDE provides counsel and advocacy services. It also works to build governance and transparency capacity in communities and populations, lobbying and engaging in citizen's watch. Its funds come from calls for proposals or

partners who also work on the same issues, which means it can remain completely independent of the mine operators.

In the Sangarédi area, CECIDE has undertaken awareness raising initiatives and works with three paralegals trained in governance and transparency to advocate for the population. CECIDE has some knowledge of the mining code and the provisions concerning compensation and resettlement.

Given its commitment to CSR and transparency in the management of funds, CECIDE is a civil society organization that could play an interesting role in the Expansion Project, and more broadly with respect to community actions.

We repeat, constitution of a Comité Préfectoral de Développement (CPD, prefectural development committee) is currently in progress. This committee will include representatives from civil society organizations, elected representatives and members of the prefecture's technical services. Its role in implementing the SEP must be considered.

Another NGO active in the area is the Centre for International Studies and Cooperation (CECI). CECI is an NGO based in Montreal with offices in Conakry, and its mission is to build development capacity in poor communities. CECI has been working for many years with the technical services of deconcentrated and decentralized authorities in the Boké region through PDLs and PAIs. CECI currently has no relations with CBG but would like to develop a connection with the company to help build the self-managing capacity of local authorities with respect to regional development.

## **5.8 DISTRICT COUNCILS, ELDERS COUNCILS AND MOSQUE COUNCILS**

We met with most of the district, sector and elders councils as well as representatives of religious councils (imams, muezzins, etc.) in an area covering the southeast quadrant of the CBG concession. These councils are quite representative of the population, though their opinions are relatively partial. We also tried to meet with women's groups and youth organizations (especially in the cities).

Generally speaking, villages far from CBG operations and without relations with the company would like CBG to be closer by, whereas those close to CBG operations find it hard to communicate with the company and to benefit from spinoffs.

However, it is important to point out that people have expectations that far exceed what is theoretically possible for a private company. They see CBG's arrival in the area as manna from heaven, without any understanding of the real impact or any real assessment of needs.

Radio CBG broadcasts are heard in few villages, as most villages are in valleys that cannot be reached by FM radio waves. There is thus no community communication nor any reliable passing on of information.

## **5.9 WOMEN**

There are numerous women's organizations in the area. Their activities are mostly related to market gardening or artisanal activities.

These organizations generally express fears about deterioration of resources as well as numerous expectations—regarding youth employment and access to water and power (including as paying customers), etc.

## **5.10 UNIONS**

There are two trade union federations, one in Sangarédi and the other in Kamsar. There is no official union affiliation at CGB: all CBG employees are free to participate in union elections.

The unions' role is to advocate for and defend the interests of the employees of CBG.

The unions play a role in internal communication and must be considered in the SEP. In particular, they are involved in the internal process for managing complaints and they play a role as mediators when necessary.

## **5.11 SUBCONTRACTORS**

The CBG regularly uses suppliers or affiliates for some of its work, among others the companies Géoprospect and Tounemine.

These two companies are involved in prospecting in particular. These companies are poor communicators and this is a source of conflict. Measures are regularly taken to correct this.

Specifically, officials and inhabitants in the areas where prospecting is to take place are not adequately informed of planned activities, and drilling equipment often simply just arrives (according to the inhabitants but also according to CBG employees) without any prior communication.

The role of these subcontractors and their integration in an SEP and in a communication plan is thus crucial.

### **5.12 MICROENTERPRISES (MB)**

CGB creates microenterprises to supply services. This very often leads to activities with the population and generates an economic dynamic that is beneficial for CBG not only in terms of services purchased and provided but also in terms of communication.

The microenterprises are intermediaries between the population and CBG and the discourse regarding them helps to give CBG a positive image and generally to distribute information.

Procedures for creation of a microenterprise are quite strict, but they give access to working capital that is reimbursable after a year of operation.

## **6 SEP OBJECTIVES**

As CBG is a mining company, its main objectives are to extract, ship and sell ore. The SEP must help to optimize the social integration of the Project into the human environment. This in turn should bring some social peace that will not only facilitate the extraction and shipping of ore but will also make it possible to build a long-lasting and beneficial relationship with the different actors in the region. The specific objectives of the SEP are thus as follows:

- to build good long-term relations among stakeholders;
- to facilitate and improve negotiations between CBG and other stakeholders;
- to identify, on an ongoing basis, new issues, expectations and possible constraints that stakeholders may raise;
- to ensure regular follow-up and evaluation of Project impacts and CBG activities in general in order to optimize positive impacts and mitigate those that are negative or perceived as negative;
- to improve the framework for CBG's social actions and for funding from CBG (equity funding or financing from taxes owing);
- to promote maximum positive local spinoffs, in particular jobs and services/sales;
- to allow multilateral communication among stakeholders and ensure the widest and most transparent dissemination of information possible.

## 7 PROVISIONS FOR SEP IMPLEMENTATION

Generally speaking, here are our findings based on interviews of the different stakeholders in the area:

- Stakeholders in the three Project zones speak of a lack of communication between CBG and the communities as well as between the communes and the communities.
- There is (or there no longer is) any real framework for CR/SP/CBG cooperation.
- Community actions are taken, but they could be more locally rooted.
- There is no system for receiving and processing complaints.
- The Government has relinquished its role as provider of basic social services.

Given these perceptions by the stakeholders we met, proposals can be formulated for stakeholder engagement that would address local communication as well as ways and means of taking action together (community projects, for example).

A proposal will also be made with respect to communication regarding preapproval studies, whether in compliance with legal provisions (considered necessary for stakeholder engagement) or for the actual carrying out of the studies.

### 7.1 INTERNAL COMMUNICATION

Despite major efforts made by CBG, there is departmental siloing at CBG. Clearly, not everyone can have the same level of access to the mass of information concerning and generated by a company of this nature. However, certain lines of internal communication could be reinforced, between the Community Projects and HSE departments in particular. The organizational structure of the Community Projects department could also be modified for better coordination with HSE activities. Appendix 2 offers some food for thought on this.

Flow of information could also be encouraged between the different Project components, in particular between the mine and Kamsar, and especially between departments that are directly in contact with the population.

Such internal communication requires redefinition of levels of confidentiality and facilitation of cross communication—reserving vertical hierarchical communication

for high levels of confidentiality only or cases where the information is not of direct interest to other departments.

A useful tool here is the news bulletin on social affairs, communication and HSE.

Transparent dissemination of such information need not be internal only. Communication of such information to partners could be considered, and even its dissemination via a regular radio broadcast, for example.

For all CBG staff and suppliers, social orientation is recommended. This could take place after the usual health and safety orientation. It could take the form of a 20-minute film explaining standards of good behavior for employees in their interactions with the population. This question is also addressed below in the section on external communication.

## **7.2 EXTERNAL COMMUNICATIONS STRATEGIES**

The diverse objectives of the communications strategy need to be defined. These objectives entail setting up a system for strengthening local communication; establishing a forum to encourage intercommune and prefectural dialogue; and also promoting efforts to discuss national issues. In the special case of the impact assessments, a few measures must be taken immediately.

**Local communication** could include:

- facilitators from the relevant districts;
- a communications team based in Kamsar and Sangarédi;
- radio broadcasts;
- providers and subcontractors to incorporate basic messages into their terms of reference;
- respect for village social norms by CBG employees and subcontractors;
- development of an ESMP, specifically a resettlement action plan (RAP).

The system should also include a **discussion forum** to promote open communication with communities and technical services:

- the discussion forum would include quarterly meetings of stakeholders in Sangarédi, Boké (including Tanéné and Kolaboui communes) and Kamsar;
- widest possible distribution of CBG's internal newsletter;
- organization of formal public consultations regarding previous studies.

**At the national level**, and with the government's deconcentrated departments, an open dialogue should ideally be initiated with regard to:

- strengthening ties with the BGÉÉE as part of the studies and implementation of an ESMP;
- initiating discussions to harmonize CBG's contributions with the Mining Code;
- restoring the government's social services role as a supplier of water and electricity;
- conducting a national, regional and local public information campaign highlighting CBG's actual contribution to the supply of social services.

Finally, some local communications measures need to be immediately put in place by CBG to ensure effective implementation of previous studies and the above proposals.

These different aspects of the communications strategy are detailed in the following sections. The mechanism for handling complaints and grievances will be covered in a separate chapter.

### **7.2.1 System for local and community-level communications**

Most of the villages in the mine concession do not have access to FM radio programs because of the topography. Improving CBG's radio equipment (and conversion to digital broadcasts) would have only a minor impact on the level of reception in the concession. A different strategy for disseminating information to the local people is therefore required; and local people also need a way of conveying information directly to the relevant CBG departments.

#### **Facilitators from relevant districts**

In the districts affected by the project, one to three facilitators per district should be identified, depending on the size of the district, its level of isolation and the level of potential impacts of the project.

Ideally, every facilitator should:

- write and speak French;
- speak the local language; and
- be recognized by the local population and representatives as being morally irreproachable.



The facilitator's or local communication officer's role could include the following tasks:

- disseminating information from CBG;
- helping organize community meetings and consultations as part of CBG activities;
- participating in CBG-run awareness activities;
- passing local information on to CBG.

In addition to these activities, facilitators could also register and transmit complaints, which will be discussed later.

Facilitators will require resources to carry out these activities. CBG will therefore have to provide them with a budget covering a motorbike, a cell phone and telephone credit in addition to a CBG-registered number.

A service contract between the facilitators and CBG should be arranged. Formalizing this commitment will include an induction process and a certain number of training sessions that the development and training centre (CDF) will incorporate into its catalogue.

#### **A communications team based in Kamsar and Sangarédi**

Conveying information is a complicated task. A poor understanding or distortion of a message could have a negative impact on the project as well as for the authorities or the community. The activities carried out by facilitators need to be monitored.

A community relations team should be set up on a full-time basis. Its role will be to collect information from the various CBG departments and providers, and develop communications material (content and format). It will work under the direction of the communications manager in collaboration with radio services (see Appendix 2).

The communications material could simply consist of telephone information, printed technical documents (cards, laypeople's data sheets, etc.) or information sessions and awareness programs.

This team needs to be provided with a means of transportation and communication so that it can visit the various facilitators on a regular basis to monitor and assess the quality of the information they convey.

### **CBG and its providers and subcontractors to incorporate basic messages into their terms of reference**

For the system to function, field officers particularly those in direct contact with the local people (i.e., Geoprospect for surveys and SSE officers for prospecting activities) need to provide the communications unit with information on their work so that it can inform the local population about activities planned for the area.

#### **Radio broadcasts**

CBG operates its own radio station, which is widely used. As part the SEP, the suggestion has been made to integrate the community relations team with the existing community project team.

#### **Respect for village social norms by CBG employees and contractors**

The field teams that visit the villages in the mining concession create an image of CBG within the community. If they fail to abide by the rules of courtesy and decorum or the village social code, they will project a poor image of the company.

Being respectful of the local people must be an imperative for CBG employees and service providers. Respect is the basis of communications, and is vital to establishing healthy relationships among stakeholders.

A social induction process should be carried out, either in the form of a film on CBG's communications charter, human relations objectives, communications strategy and code of behavior when liaising with stakeholders.

#### **7.2.2 Discussion forum for intercommunal communication**

A consultative committee once existed in Sangarédi. It met every three months with CBG, the commune and deconcentrated services. Re-establishing this forum could form a solid basis for dialogue among stakeholders.

Obviously there is a risk that this committee could become aggressive resulting in back and forth demands and refusals. The committee's role needs to be defined and set out in a terms of reference, and could eventually be formalized in a signed protocol or memorandum of agreement.

To promote dialogue throughout the project impact zone, three discussion forums could be set up:

- one in Sangarédi including the rural communes located in the mine concession (Sangarédi and Daramagnaki): this group would need to

include commune representatives, representatives from the most severely impacted districts, diverse deconcentrated technical services, civil society (representatives from communities and NGOs such as CECIDE), CBG, service providers in contact with the local people, and independent media facilitators;

- one in Boké at the prefecture level to address issues related to CBG activities. Ideally this should be the same committee in charge of monitoring mining activities in the project area and the CBG's joint advisory committee. This forum is described in greater detail in the section below on collaborative efforts for social action;
- one in Kamsar, including CBG, the commune, technical services, districts, civil society organizations, very small businesses and other service providers, and independent media representatives.

People from the communications teams should take part in these committees. A minimum budget should be allocated for organizing the meetings and ensuring the greatest possible attendance. Transparency and widespread dissemination of the information are key to improving the quality of the dialogue.

The proposal to promote coverage of these meetings, specifically by inviting independent media to attend and explaining the committees' role and limitations to them, shows good faith on CBG's part and ensures that the information will be disseminated beyond the group at the meeting.

Moreover, as a complement to these discussion forums, broader distribution of the CBG's internal newsletter could play an important role among literate people.

### **7.2.3 Dialogue with the government**

#### **Building ties with BGÉÉE**

Ties should be established with BGÉÉE as part of the studies and the implementation of an SEP. The Guinean government is currently preparing mining legislation and is strengthening its capacities as regards environmental and social impact assessments.

CBG should become part of this and embrace the new legislation. Until a decree is passed implementing the legislation this could often prove difficult but with CBG's experience and historic role in Guinea it could only benefit from supporting the government's efforts.

BGÉÉE was already approached in the startup of the Environmental and Social Impact Assessment during the scoping study.

### **Dialogue on the Mining Code and the harmonization of contributions**

Discussions on harmonizing CBG's contributions with the Mining Code should be launched if they have not been already. The Mining Code specifies the payment of 0.5% of business revenues to communities affected by the project. The terms of payment and management of these funds are discussed in a later chapter. The topic is discussed briefly in the SEP, but will be addressed more thoroughly in the ESMP.

If CBG is required to pay this business revenue tax, its contribution to the central government could be subject to discussion and review. The equity funding provided by CBG should also be reviewed in terms of the objectives to be achieved with this funding, and the nature of and conditions governing community action.

CBG has considerable experience in this area that could be helpful. It has also contributed to the review of financial legislation as regards donations.

### **Restoring the government's role delivering social services**

CBG is omnipresent when it comes to delivering social services in the project area. It contributes to the supply of electricity and water in Kamsar, Boké and Sangarédi; and it built or helped build most of the social infrastructure (i.e., schools, health posts, etc.).

However, it should be noted that

- water distribution is deficient and the lack of an effective delivery system engenders dissatisfaction among the local people;
- electricity distribution is inefficient and hence a major issue;
- health and education infrastructure is inadequate, for lack of personnel. And infrastructure is lacking or poorly maintained owing to poor management.

Filling in for the government could jeopardize CBG's operations. It cannot assume responsibility for providing these services. It can contribute to funding them as part of a coherent framework for social involvement and compensation and to meet philanthropic objectives. But a mining company cannot build the management expertise needed to provide local people with water and electricity. The government has to re-establish its regulatory role and ensure the proper use of donations made by CBG.

Another essential point is that the communes need to play a major role in this regard and cannot demand that CBG assume the responsibility for them, which would jeopardize the company's operations and legitimacy.

It is up to CBG to initiate a dialogue with the government on this issue, develop a more participative strategy for social intervention and ensure the communes assume their responsibilities (see section 7.6 on collaborative efforts for social action).

### **Public information at the national level**

CBG management has a measured national communications strategy. It is no media star like some companies that flaunt their smallest investment. However, to ensure the local people understand the role a mining project such as CBG's can play at the national level, some information has to be disseminated more broadly including

- CBG's annual contribution to the government budget;
- its production objectives;
- its annual contribution to social development in the region; and
- its main actions.

Although communicating such information is in a sense a marketing effort, it is also important for CBG to be known locally for its contributions to the government and communities. Highlighting the contributions it makes to the government will help restore the role it plays in the Boké prefecture.

## **7.3 STAKEHOLDER MANAGEMENT PLAN FOR THE ESIA**

This section describes the approach recommended for engaging stakeholders with regard to the social baseline and impact studies, along with the roles played by CBG and the EEM teams. The stakeholder engagement strategy as described below complies with the IFC environmental and social sustainability performance standard specifically the section on stakeholder engagement (items 25 to 36 of PS1).

The stakeholder engagement strategy to be implemented as part of the ESIA includes the following steps:

- identifying stakeholders who are potentially interested in the CBG expansion project;
- developing a stakeholder engagement plan (SEP) consistent with project risks and impacts and based on the interests and concerns of

communities that are potentially affected by the expansion project (this report);

- disclosing relevant information on the project to potentially affected communities and other stakeholders;
- consulting potentially affected stakeholders as part of an informed consultation and participation (ICP) process;
- rigorously document stakeholder engagement activities using social management software and prepare a summary report on consultations carried out throughout the impact assessment;
- developing a social management plan.

### 7.3.1 Identification of stakeholders

The first field visits by social teams in the scoping mission from October 5 to 24, 2013, were an opportunity to conduct more than 500 interviews with stakeholders inside the study area. The main objective of this mission was to identify priority stakeholders for CBG's expansion project and learn about their concerns regarding the project. A preliminary list of stakeholders potentially targeted for consultations on project-related issues is provided below:

Issue	Potential Stakeholders <sup>1</sup>
Communications	<ul style="list-style-type: none"> <li>• All PPPs</li> </ul>
Employment	<ul style="list-style-type: none"> <li>• Subcontractors</li> <li>• Unions</li> <li>• Elders from the affected communities</li> <li>• Local youth</li> <li>• Women</li> </ul>
Economic development	<ul style="list-style-type: none"> <li>• Reference prefecture(s)</li> <li>• Reference rural commune(s)</li> <li>• Reference subprefecture(s)</li> <li>• Elders from affected communities</li> <li>• Local entrepreneurs</li> <li>• NGOs</li> <li>• Local interest groups (women, youth, groups, etc.)</li> <li>• Civil society</li> </ul>
Infrastructure	<ul style="list-style-type: none"> <li>• Reference prefecture(s) (technical services)</li> <li>• Reference subprefecture(s) (technical services)</li> <li>• Reference urban and rural commune(s)</li> </ul>

<sup>1</sup> NB - For deconcentrated and decentralized public services, the relevant person within each institution will have to be contacted, where applicable.

Issue	Potential Stakeholders <sup>1</sup>
	<ul style="list-style-type: none"> <li>• Civil society</li> <li>• Districts</li> </ul>
Land/land use	<ul style="list-style-type: none"> <li>• Reference commune(s)</li> <li>• Elders from affected communities</li> <li>• Lineage elders</li> <li>• Land owners and occupants</li> <li>• Civil society</li> </ul>
Resettlement	<ul style="list-style-type: none"> <li>• Reference prefecture(s)</li> <li>• Reference rural commune(s)</li> <li>• Reference subprefecture(s)</li> <li>• Elders from affected communities</li> <li>• Districts</li> <li>• Civil society</li> </ul>
Migration	<ul style="list-style-type: none"> <li>• Reference prefecture(s)</li> <li>• Reference rural commune(s)</li> <li>• Subprefecture(s)</li> <li>• Elders from affected communities</li> <li>• Districts</li> <li>• Civil society</li> </ul>
Health risks	<ul style="list-style-type: none"> <li>• Reference prefecture(s)</li> <li>• Reference rural commune(s)</li> <li>• Reference subprefecture(s)</li> <li>• Elders from affected communities</li> <li>• Districts</li> <li>• Local interest groups (women, youth)</li> </ul>
Road traffic	<ul style="list-style-type: none"> <li>• Reference prefecture(s)</li> <li>• Reference rural commune(s)</li> <li>• Reference subprefecture(s)</li> </ul>
Environmental degradation: (specifically in Zone 1) Loss of land Decrease in pastureland Water pollution Blasting	<ul style="list-style-type: none"> <li>• Reference rural commune(s)</li> <li>• Reference subprefecture(s)</li> <li>• Elders from affected communities</li> <li>• Districts</li> <li>• Local interest groups (women, youth and economic interest groups.)</li> </ul>

**Table 7-1:** List of stakeholders by main issues.

A preliminary list of stakeholders by project zone was also prepared, and is provided in Appendix 6. This list will be updated throughout the project as the consultations progress.

### **7.3.2 Disclosure of relevant information**

The purpose of disclosing relevant information to potentially affected communities and stakeholders is to ensure they understand the impacts and opportunities associated with the bauxite mine expansion project. The information disclosed needs to be tailored to the audience in the three project zones and should include:

- a description of the expansion project, its main components and component schedule;
- potential issues related to the expansion project by zone and by sector;
- the process envisaged for the stakeholder consultations; and
- the complaints handling mechanism as described in section 7.4 herein.

The communications tools and messages developed by the relevant teams should be designed to clearly disseminate information, thereby ensuring stakeholders fully understand the expansion project and that discussions and debates regarding projects impacts and potential opportunities occur.

Given the technical nature of the expansion project, project-related information will be released by CBG expansion project and operations employees as described in section 4 of this report.

The disclosure of project-related information will include:

- a presentation by CBG of the scoping report to BGÉÉE for the adoption of terms of reference from previous studies;
- organization of information sessions in early December in the three project zones (Kamsar, Sangarédi and Boké). These information sessions should include representatives of decentralized communities (rural/urban communes and districts), those in charge of deconcentrated government services (subprefectures), as well as a few civil society organizations and CBG partners; and
- dissemination of technical information that is as comprehensive as possible (in line with the confidentiality required for production information) to villages in the project impact zones. This information will be disseminated by CBG employees designated to accompany the EEM field teams during the consultations with potentially affected stakeholders (see below).



### **7.3.3 Stakeholder consultations**

Once stakeholders have been identified and project-related information sessions have been launched, a consultation program will also be launched.

The objectives of these consultations are three-fold:

1. Ensure potentially affected individuals can participate freely in the consultations on the project to increase bauxite production;
2. Provide those who may be affected an opportunity to express their concerns and get answers to their questions regarding the project;
3. Ensure that the views, preferences and concerns of potentially affected individuals are taken into consideration in validating potential alternatives, identifying impacts, and developing mitigation, compensation and monitoring measures.

The current approach to engaging stakeholders with the environmental and social impact assessment and more broadly with the mining project is to conduct structured consultations in the form of discussion groups in each of the three zones affected by the project to increase bauxite production:

- Zone 1: the mine zone in the Sangarédi region;
- Zone 2: the plant and port zone in the Kamsar region;
- Zone 3: key points along the railroad line between Sangarédi and Kamsar.

Consultations will be held as part of the next two studies to be performed (i.e., the baseline study and impact assessment); a minimum of two visits will be made to affected communities. Additional consultations may be held as necessary, according to issues and needs.

The methodology entails initiating discussions with diverse interest groups that are directly or indirectly affected by the expansion project, similar to discussion groups held with local people in the study area, specifically near urban centers of Kamsar and Sangarédi and in villages along the railroad line. The discussions will address the stakeholders' relationships with CBG, their understanding of the expansion project as well as their concerns or questions regarding the project. Discussions groups will be formally established, with official associations representing civil society organizations, or informally set up as in the case of youth groups.

Traditional authorities (councils of elders and mosque councils) will be included in the discussions, even if their members are likely to also be part of other

economic interest groups that are consulted. The goal is to address the widest possible range of groups for all strata of local society. Additional efforts will be made to ensure vulnerable groups (i.e., women and young people) are included in the discussions.

Input from subprefecture and prefecture administrations will be solicited and incorporated into the SEP. Regional authorities will also be consulted, along with deconcentrated technical services.

Consultations it should be noted will focus on engaging with those groups that are likely to be directly impacted by the project with additional effort made in villages/hamlets that are likely to be resettled (in Zone 1) and the communities directly impacted in the three zones (communities near sidings at KP 14 and 118).

Once the studies are complete, public consultations on project impacts and the main mitigation measures will be organized with the BGÉÉE. These consultations will include the largest possible number of participants, will be publicized and will promote a good understanding of the issues. They could be organized in Sangarédi, Kamsar and Boké.

Key CBG personnel could be involved in the consultation process to provide appropriate explanations and information on the expansion project. Since the appearance of neutrality is essential for the consultations team, the terms and conditions governing the participation of key CBG personnel will need to be discussed in planning the consultations.

#### **7.3.4 Documenting stakeholder engagement activities**

The social team will use Darzin software, an online platform available in French, for documenting and analyzing consultation content. The program lets you download lists of stakeholders as part of the scoping study and classify them by location, and their institutional or social connections. These lists can be modified, adapted and completed as the project progresses thereby providing a changing snapshot of stakeholders who may be affected by the project.

Darzin allows users to download notes and comments collected during consultation activities by field teams and analyze specific content according to a classification tree containing the study's main themes, hence the main potential direct, indirect and induced impacts and the stakeholders themselves. Complaints made during the consultations can be highlighted, along with commitments made by the proponent or consultation team to the communities involved in the consultations.

The content of consultation activities is recorded by the field teams on a specific form presented in Appendix 7. The form is designed to ensure the smooth transition of the information collected to the database. Intermediary personnel then take charge of integrating the content of the consultations into the database and analyzing it.

Detailed quantitative reports can be produced on the frequency of recurrence of specific themes during the consultations, or on the comments or questions linked to a stakeholder or group of stakeholders. Data processing parameters and angles can be precisely determined to produce reports depending on information requirements and to ensure the process is thoroughly carried out.

### **7.3.5 Environmental and social management plan (ESMP)**

In light of the issues associated with such a project and on the basis of the baseline study and the impact assessment, CBG is required to develop an environmental and social management plan (ESMP).

Apart from the fact that an ESMP is a legal requirement, this tool will enable CBG to articulate the actions it plans on taking as regards sustainable development and social involvement and to incorporate its SEP and communications plan into a broader more coherent framework.

Tools will need to be identified in the SEP for managing project impacts and consideration should be given to the possibility of developing land use management, migration and development plans in partnership with other stakeholders in the region.

## **7.4 GRIEVANCE HANDLING MECHANISM**

### **7.4.1 Approach**

Establishing a complaints and grievances management system is one of the recommendations of the World Bank and one of the IFC performance standards (GN 1 – Assessment and Management of Environmental and Social Risks and Impacts and GN 5 – Land Acquisition and Involuntary Resettlement).

All complaints made by stakeholders can be recorded and processed using this system. Complaints can be recorded in the system independent of the main stakeholders, their classification by CBG and the way in which they are handled by CBG or its partners where applicable.

Complaints may arise out of the stakeholders' poor understanding of the conditions for implementing the ESMP, a lack of communication, and the

perception of injustices arising from project implementation (specifically as regards involuntary resettlement and RAP).

Various complaint handling mechanisms can be put in place depending on the seriousness and extent of the complaint:

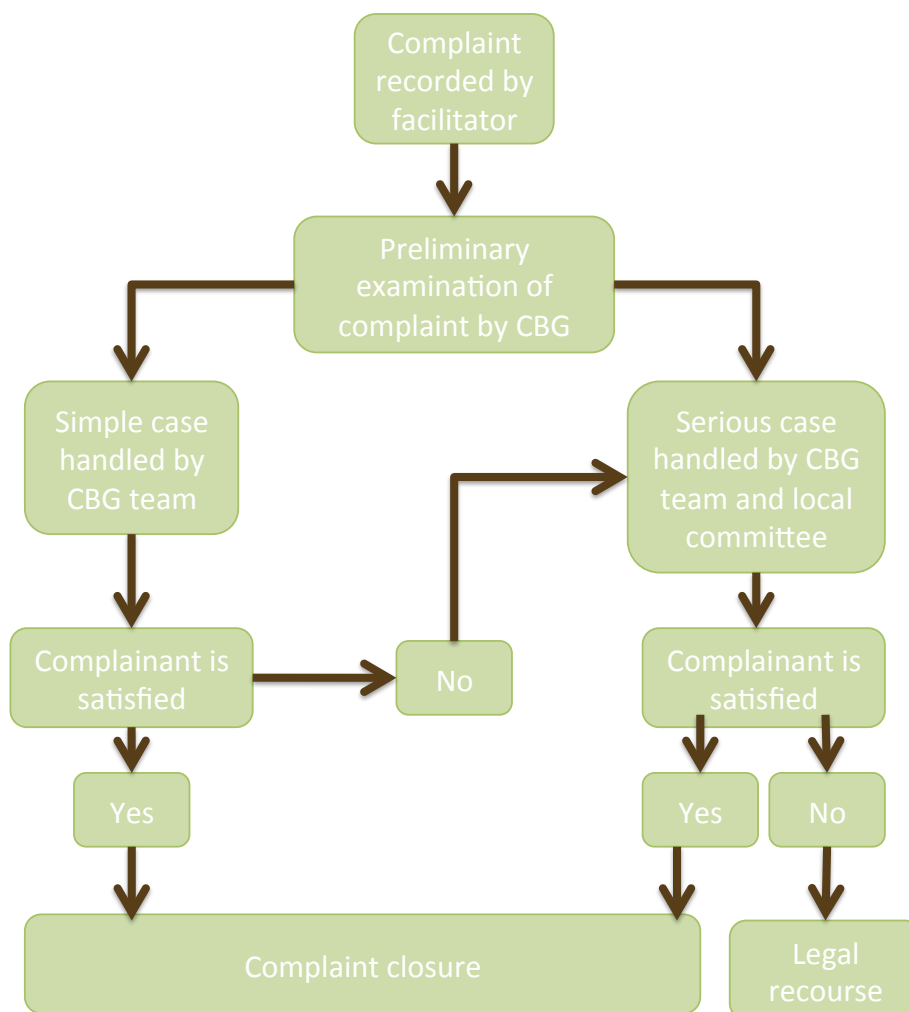
- mediation can be used to explain and clarify a situation with respect to individual rights and responsibilities;
- corrective measure(s) can be implemented; when a third party is aggrieved, it is up to project management to propose corrective action; or
- arbitration can be organized, involving the council of elders, or the intercommunal committee referred to above.

Judicial processes are to be avoided and an amicable solution preferred. Complainants in fact need to be informed that launching a legal claim is a long, costly and hazardous route because the court could well maintain it does not have jurisdiction to rule in the matter.

#### **7.4.2 Mechanism**

CBG therefore needs to set up an extra-judicial mechanism for settling complaints using third-party mediation or arbitration. This mechanism involves:

- receipt and recording of the complaint;
- preliminary evaluation and classification;
- complaint handling; and
- closure of complaint proceedings.



**Figure 7-1:** Diagram of complaint handling process.

The various steps for receiving, processing and finalizing complaints are detailed below.

### **Receipt of complaint**

Complaints are recorded by facilitators, the only ones who are authorized to receive and record individual or group complaints at the district level. Complaints may be submitted verbally or in writing.

In Kamsar, complaints may be filed directly at the Community Relations office.

The complaint will be officially recorded in a register. The registration will be dated and the complainant will be informed of the processing timeline. Complaints are then tracked and the file completed as the complaint is processed until the case is closed.

CBG needs to ensure the relevant communities are fully aware of the existence of this mechanism.

Group complaints at the communal or intercommunal level may be filed directly at the complaints office under the same conditions.

### **Preliminary examination**

A complaints handling office should be set up as part of the community relations or HSE department in Kamsar and Sangarédi (see Appendix 2). Facilitators will inform this office along with the communications team of complaints that have been filed. The communications officer will be informed of commune-level complaints by the head of the complaints handling office.

The level of importance of the complaint will be analyzed in terms of its scale (individual, village-level, commune-level complaint) and its severity (lack of understanding, low-level damage, serious damage, etc.). A risk analysis matrix such as the one shown in Appendix 8 could be used in such assessments; however, this matrix should be simplified to facilitate the classification and timely processing of complaints.

Depending on the urgency and level of importance of the complaint, the community relations manager will consult with internal resources in assessing the complaint.

The level of severity and specific underlying reasons for the complaint will be examined.

Classification	Description of severity of complaint
Category 1	Isolated complaint, with no impact on project or community
Category 2	Reiterated complaint, with limited impact on project or community
Category 3	Isolated complaint, with major impact on project or community
Category 4	Reiterated complaint, with major impact on project or community

**Table 7-2:** Complaint classification tool

The above table describes the four categories for classifying complaints in the preliminary examination.

In every case, CBG will combine all complaint-related evidence and documents in the open file, including minutes of meetings held with the complainant if applicable.

For category 3 and 4 complaints, the discussion forum and the prefectural mining activity monitoring committee (CoPSAM, see Appendix 3) may need to be used.

### **Complaint handling and tracking**

In less severe cases, i.e., those with little impact on the community or the project, a rapid assessment of the validity of the complaint will be performed by the complaint handling department. A solution will then be suggested to the complainant directly. Should this fail to resolve the situation, a mediation process will be initiated with customary authorities. In such cases, the proposed solution will generally amount to a simple mediation process or minor corrective measures.

In more serious cases (category 3 and 4 complaints), the complaint handling manager will organize a meeting with the complainants in the presence of customary authorities. An investigation will be conducted by the department to identify the origin of the complaint and devise a solution. The departments associated with the complaint will be mobilized by CBG.

Mediation and arbitration will be conducted with CoPSAM or the intercommunal committee. Any proposed corrective measures will be subject to approval prior to implementation. The local committee will track the complaint and confirm the case is closed.

### **Complaint closure**

All complaints are registered, with the various pre-processing and processing steps recorded in the file.

Mediation, arbitration and corrective measures are subject to prior approval and final agreement indicating the case is closed.

Special attention is paid to every complaint record, which is a prime tool in the social monitoring-evaluation process.

Legal recourse is a last resort in cases where it is not possible to reach an agreement and close the case.

#### **7.4.3 Complaint processing timelines**

For the system to operate, it is vital that complaint processing timelines be short and always respected. The table below provides **maximum** timelines for handling complaints from the time they are filed to the time the cases are closed.

Action	Timelines as of filing date, in number of days	
	Categories 1 and 2	Categories 3 and 4
Complaint filing	0	0
Registration	0	0
Preliminary examination and classification by category	7	7
Preparation of verification file	10	15
Determination of complaint handling approach	10	20
Mediation	15	30
Arbitration	na	30
Corrective action	15	35-40
Complaint tracking	20	40-45
Closure	<b>30</b>	<b>50</b>

**Table 7-3:** Maximum timelines for handling complaints

These timelines reflect linear processing timelines (i.e., where no referral to a previous step is required during the complaint handling process). Although these timelines may not be exceeded, completing the entire process in less time is possible.

Once the course of action has been decided, the information is sent to the complainant. Moreover, complainants should be able to consult facilitators to find out about the status of their complaint.

For facilitators to fulfill their role as facilitators they need to stay out of the complaint handling process. Their role is limited strictly to communicating and transmitting (and recording) information.

## 7.5 MONITORING AND EVALUATION MECHANISMS

Actions taken by CBG directly involving the local people are subject to social monitoring (as specified in the ESMP).

Objectively verifiable indicators need to be developed to allow for rapid monitoring of actions taken by the HSE department or as part of community projects. Indicators need to be developed in particular to qualify and quantify information conveyed to stakeholders.

These indicators are to be developed with input from relevant departments. Personnel from various teams can be assigned on a regular or occasional basis to survey and compile these indicators.

Examples of communications monitoring indicators are provided in Appendix 4.



## 7.6 COLLABORATIVE EFFORTS FOR SOCIAL ACTION

### 7.6.1 Use of business revenue taxes and equity funding

The community project unit currently reports directly to senior management. That may initially appear surprising given the operational nature of the work the unit performs.

This SEP is not designed to suggest a restructuring of CBG bodies; however, thought could be given to integrating the community project unit with either operations or the health, safety and environment department (which could then be called "Health, Safety, Environment and Community Relations). A proposed structure for the teams is given in Appendix 2. It is provided for reference purposes; it rests with CBG to determine how effective and relevant such a structure would be.

Whatever is decided, the community project unit needs to be strengthened. It currently has very few human and logistical resources to engage in a full participatory process. A community project unit should be set up in Sangarédi as well as in Kamsar.

Project selection conditions need to be considered by the three discussion forums referred to above. Such intervention might include:

- **Community action financed with equity funding:** CBG invests its own funds in community development projects (infrastructure, training and support, creating and supporting very small businesses). Decisions regarding actions could be extensively debated with potential beneficiaries, specifically as regards forms of ownership, reassignment and management. In return, CBG retains full responsibility for implementation.
- **Community action financed by business revenue taxes:** Business revenue taxes are funds that belong to the community. At any rate, communities should be able to make use of the funds as they see fit provided that they are used in compliance with the Local Governments Code. The Mining Code should stipulate regulations for the payment of these taxes and conditions for the implementation of projects that receive funding. CBG should also develop a strategy with communities concerning the amount of business revenue taxes. This strategy could for example be based on the village organizations support program (PACV) and the Boké capacity building project (PRCB). To prevent the misuse or poor

management of these funds, extensive communication with regard to their use is needed.

### **7.6.2 Water and electricity management**

The management of water and electricity is a difficult issue. On the one hand, it is clear that CBG can not commit to supplying water and electricity to the cities and towns in the region, that the government, which normally has jurisdiction over the provision of these services, is failing to provide services in the towns in the region, and that communities do not have the capacity to manage these services.

Delegating these services and CBG's withdrawal should be carried out gradually. In Kamsar, a project involving a private operator failed, even though it was a fairly sound option. In the town of Sangarédi, work is needed managing connections, and possibly the installation of meters. An SMB could be launched (based on the very small business model) to gradually manage basic services, in collaboration with CBG. Individual interests of CBG officials and communities are likely to represent an obstacle. The process needs to be absolutely transparent.

### **7.6.3 Shared use of resources and harmonization of practices**

A number of mining companies operate in Boké prefecture. Careful consideration must be given today to the disbursement of business revenue taxes. If mining companies eventually operate at the same time in the area, the total amount of accumulated business revenue taxes is very likely to largely exceed the communities' capacity to absorb the funds.

The communities and deconcentrated services need to address the harmonization of their relationships with mining companies. Creating CoPSAM, which would replace all the other monitoring committees and bring them under one coordinating organization, could represent a solution. A proposal is advanced in this regard in Appendix 3.

Elected officials from the Boké prefecture or commune group should also consider setting up an association (or foundation) in which to deposit funds from the business revenue taxes. An implementing agency would be responsible for managing the funds, whereas an elected body (or board of directors) would be responsible for allocating the funds (project selection). The prefecture development committee could be involved in the process providing the communes with advice.

## 8 RESOURCE MOBILIZATION

In the short term, a team needs to be mobilized to explain what the project entails.

The table below outlines human resource requirements for implementing the SEP.

Department	Location	Number
Facilitators	Sangarédi Centre	4
	Boulléré	2
	Kourawei	2
	Wossou	1
	Souka	1
	Balandougou	1
	Daramagnaki	2
	Other district explored	na
Community communications team	Community communications manager	1
	Kamsar communications manager	1
	Sangarédi communications manager	1
	Kamsar communications officer - railroad	1
	Sangarédi communications officer - mine concession	2
Community action	Team to be mobilized	10+

**Table 8-1:** Mobilization of human resources

A budget is required for facilitators. Funding in the amount of 500,000 to 1,000,000 GNF/month would allow facilitators to charge their phones, travel and acquire teaching materials.

Communication teams also need to be equipped with phones and means of transport. Existing materials and personnel could be redeployed.

Funds for setting up discussion forums will be needed along with a special budget for organizing public consultations.

The table below shows requirements for the first year of operations.

Heading	Number	Frequency	Unit cost	Total
Facilitators	11	12	700,000	92,400,000
Committee mobilization	3	4	500,000	6,000,000
Organization of launch of public consultations	1	3	10,000,000	30,000,000
Organization of results of public consultations	3	1	70,000,000	210,000,000
<b>Total</b>				<b>338,400,000</b>

**Table 8-2:** Provisional budget for first year

In addition to this budget, a team could be mobilized to support CBG in setting up the system. Such technical assistance could be provided for generally monitoring community action.

## 9 CALENDAR FOR STAKEHOLDER ENGAGEMENT PLAN

The table below proposes a calendar for the implementation of the stakeholder engagement plan, which is primarily dependent on when the SEP is finalized and approved by CBG internally.

Activities	O c t 1 3	N o v 1 3	D e c 1 3	J a n 1 4	F e b 1 4	M a r c h 1 4	A p r i l 1 4	M a y 1 4	J u n e 1 4	J u l y 1 4
<b>Identification of stakeholders – EEM</b>										
First list of stakeholders										
Final list of stakeholders										
<b>Stakeholder Engagement Plan (SEP) – EEM</b>										
Preliminary SEP (study, operations)										
Final SEP (operations)										
<b>Disclosure of relevant information – CBG</b>										
First information sessions for potentially affected communities										
Presentation of scoping study and report to BGÉÉE										
Participation of a specialist in consultations										
<b>Stakeholder consultations</b>										
Initial consultations (scoping mission)										
Consultations during baseline study and impact assessment										
<b>Implementation of communications team (CBG)</b>										
<b>Implementation of network of facilitators (CBG)</b>										
<b>Final public consultations (CBG)</b>										
<b>Finalization of communications strategy (CBG)</b>										
<b>Mobilization of consultative committees (CBG)</b>										

**Table 9-1:** Provisional timetable for launching the SEP

The calendar covers the main activities associated with previous studies.

The implementation of a communications strategy and more broadly the SEP should be started and finalized as soon as possible. The startup of the expansion project is an ideal opportunity to establish community relationships with local authorities on a new footing, in compliance with international performance standards and the Guinean Mining Code.

## 10 CONCLUSION

CBG has the technical means and experience in communications and community projects. It has invested heavily in the region and operates its own radio station, a powerful communications tool. Consultations with CBG personnel and other stakeholders have helped identify a certain number of points CBG can work on to improve stakeholder engagement:

- people have noted that despite the radio station and communication efforts there is a serious lack of communication with local communities;
- the lack of communication with communities during exploratory surveys along with the lack of a clear compensation mechanism for communities have created considerable dissatisfaction within communities;
- the community project implementation strategy is not up to the task of ensuring the projects are efficient and sustainable;
- the government and local communities are not fulfilling their role supplying and managing basic social services;
- there is no formal complaint mechanism in place; and
- on the basis of previous studies, measures, more generally public education measures, are required.

In light of the above, and given the investments and efforts made by CBG, even though they were not specified in the basic agreement, CBG needs to improve stakeholder engagement and re-establish healthy, sustainable relationships with stakeholders.

This SEP represents a proposal. It should be widely distributed and discussed internally. It is offered as constructive criticism. The assessment is not meant to be definitive or exhaustive given the limited time devoted to consultations. This initial proposal for an SEP consists of four main mechanisms:

### **Community relations mechanism**

- A network of facilitators in the main affected districts;
- A communications team in Sangarédi and Kamsar that will supervise the facilitators and centralize relevant information (CBG, service providers, communities, etc.).

### **Restoration or implementation of discussion forums**

- Setting up a prefectural mining activity monitoring committee in collaboration with the prefecture (and ideally the other mining companies) to replace or combine the other committees;
- Intercommunal or communal meetings to discuss issues with stakeholders around the same table.

### **Strengthening of community project team**

- The existing team needs to be expanded. A branch group of this unit needs to be opened in Sangarédi and community development officers should be recruited. A direct link needs to be established between the team and the HSE and communications departments;
- A strategy needs to be set up to differentiate funds from business revenue taxes and equity funding in anticipation of the regulations governing the application of the mining code and in compliance with the Local Governments Code;
- The participatory component needs to be strengthened, and the project identification and selection approach based on direct consultations with local people: implementation of community communications and intercommunal or prefectural discussion forum mechanisms.

### **Initiating or continuing dialogue with the government**

- Discussions need to focus on strengthening the government's role in managing basic services;
- Amount of the respective taxes, payment conditions and advertising among local populations.

To conclude, one final point CBG should address without delay. **On the basis of the previous studies**, CBG needs to:

- organize public consultations to present the project;

- mobilize a small team that will travel through the villages in the project impact zone to provide a general technical explanation of the project;
- monitor the work of those who conducted the previous studies;
- organize public consultations, with BGÉÉE, to present the results of the impact assessment.

These mechanisms should be fully discussed internally then disseminated to stakeholders before being finalized.

# APPENDIX 1: LIST OF STAKEHOLDER CONSULTATIONS

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 5	Jeffrey Doodnath	CBG	Project Extension Logistics	Kamsar	High	
Oct. 5	Danielle Angot	CBG	Project Extension Administration	Kamsar	High	
Oct. 5	Stéphane Dallaire	CBG	Director, HSE Project Extension	Kamsar	High	
Oct. 7	Facinet Laysane Camara	Subprefecture	Direction, Small Business Bureau	Kamsar	High	
Oct. 7	Drame Aicha Barry	CBG	Executive Director	Kamsar	High	Communication issues and social movements.
Oct. 7	Alpha Keita	CBG	Director, Community Project	Kamsar	High	
Oct. 7	Ms. Sangaré	CBG	Officer, Community Service	Kamsar	High	
Oct. 7	Ms. Toure	CBG	Officer, Community Service	Kamsar	High	
Oct. 7	Robert Max Aublet	CBG	Superintendent, Public Relations and Communication	Kamsar	High	
Oct. 7	Mamadou Aliou Barry	CBG	Superintendent healthcare et Security	Kamsar	High	
Oct. 8	Alseny Camara	CBG	Secretary General, Kamsar-Conakry Labour Union	Kamsar	Medium	Seeks better wages for workers.
Oct. 8	Sekou Oumar Ly Diallo	CBG	Secretary General, Sangaredi Labour Union	Sangaredi	Medium	Hopes more workers will be hired.
Oct. 8	Ansoumane Kaba	CBG	Treasurer, Kamsar-Conakry Labour Union	Kamsar	Medium	Worried about deterioration of the environment /farmland /grazing lands/ food-gathering areas
Oct. 8	Bashir Diallo	CBG	Mine Director	Sangaredi	High	Accidents and stress caused by railroad.
Oct. 8	Kaourou Camara	Subprefecture	Subprefecture	Sangaredi	Medium	Importance of work and decent living conditions.
Oct. 8	Ibrahima Sidibe	CBG	Director, HSE Mine, Sangaredi	Sangaredi	High	Impact study is needed to keep from resettling communities at mine sites.
Oct. 8	Siba Severin Lolamou	Governorate	Governor	Boké	Medium	Project must comply with the recommendations of His Excellency, the Professor.
Oct. 8	El Hadj Daouda Bangoura	Prefecture	Prefect	Boké	Low	Environmental pollution.
Oct. 8	Samba Fraterna Barry	Governorate	Chief of Staff	Boké	Low	
Oct. 8	Ousmane Diallo	Governorate	Policy Adviser	Boké	Low	
Oct. 8	Ibrahima Barry	CR	Mayor	Boké	Low	
Oct. 8	Laye Nouhan Kaba	CR	Secretary General	Boké	Low	
Oct. 8	Guillaume	CBG	Geologist	Sangaredi	Low	
Oct. 9	El Hadj Mamadou Dioulde Bah	CR	Mayor	Sangaredi	Low	Lack of consultation/Communication gap.



Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 9	Fara Nestor Leno	Subprefecture	Director, Rural Development / Responsible for Youth and Sports	Sangaredi	Medium (information on the CBG radio station)	Quarterly meetings between CBG and the CR government (CR) should be reorganized. Henachine is conducting social surveys in the villages; CBG is not.
					Medium (information on the CBG radio station)	Conduct environmental impact studies.
					Medium (information on the CBG radio station)	Set up joint communication committee consisting of CBG, government officials and local community representatives.
Oct. 9	Sandaly Toure	Subprefecture	Labour Inspector	Sangaredi	Low	
Oct. 9	Sako Fode Mamoudou	Subprefecture	Camp Director, Water and Forests	Sangaredi	Low	
Oct. 9	Alama Conté	Subprefecture	Chair, Cogon-Tingilint Watershed Committee	Sangaredi	Low	GAC has done good work in the communities; CBG should follow GAC's lead.
Oct. 9	Mamadou Ouri Diallo	CR	Local Development Officer	Sangaredi	Low	
Oct. 9	Mariam Diallo	Subprefecture	Director, Environment	Sangaredi	Low	
Oct. 9	Moussa Camara	Subprefecture	Director, Quality Control and Standards	Sangaredi	Low	
Oct. 9	Moustapha Conde	Subprefecture	Assistant, Director of Education	Sangaredi	Low	
Oct. 9	Mamadou Hadi Balde	Subprefecture	Director, Urban Development and Environment	Sangaredi	Low	
Oct. 9	Ismael Camara	Subprefecture	Agricultural Adviser	Sangaredi	Low	
Oct. 9	Moussa Camara	Subprefecture	Officer, Department of the Environment	Sangaredi	Low	
Oct. 9	Aboubacar Conte	Subprefecture	Officer, Urban Planning and Environment	Sangaredi	Low	
Oct. 9	Mambinti Sako	Subprefecture	Assistant Subprefecture	Sangaredi	Low	
Oct. 9	Aminata Toure	Subprefecture	Public Records Keeper	Sangaredi	Low	
Oct. 9	Fatoumata Boke Barry	Subprefecture	Director, Livestock	Sangaredi	Low (rumors among CBG workers)	Greater risk of accidents for livestock on rail line and at mine.
					Low	Increased crime and cattle theft in sector.
Oct. 9	Saa Mamadou Kamano	Enhanced Health Clinic	Director, Expanded Vaccination Program	Sangaredi	Low	Seeks center's help with medication.
Oct. 9	Kadiatou Aidara	Enhanced Health Clinic	Representative, Maternity Department	Sangaredi	Low	Environmental pollution/high risk of respiratory disease.
Oct. 9	Mamadou Lamarana	Enhanced Health	Director, Hospitalization	Sangaredi	Low	High inflation on household items.

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
	Diallo	Clinic				
Oct. 9	Aissatou Sadio Diallo	Enhanced Health Clinic	Sales Clerk	Sangaredi	Low	
Oct. 9	Dr. Fatoumata Bah	Enhanced Health Clinic	Lab Chief	Sangaredi	Low	
Oct. 9	Bah Mamadou	Civil Society Bureau	Staff	Sangaredi	Low	CBG should call on the association sector ("civil society") to help resolve disputes. New arrivals may be disease carriers.
Oct. 9	Mamadou Alpha Tounkara	CR	Secretary General	Sangaredi	Low	
Oct. 9	Boubacar Bah	Bowé Services (Microbusiness)	Director	Sangaredi	Low	Seek compensation for the affected community.
					Low	Award contracts to microbusinesses so they can hire local labor.
					Low	Build schools and healthcare facilities.
Oct. 9	Mr. Toure	CBG	Geologist	Sangaredi	Low	
Oct. 9	Mr. Barry	CBG	Geologist	Sangaredi	Low	
Oct. 10	Dr. Yacine Diallo	Hospital (CBG)	Director	Sangaredi	High (interview with CEO)	Growing population.
Oct. 10	Fode Sangaré	Subprefecture	Director of Education	Sangaredi	Low (Rumor)	Assistance from Department of Education in obtaining school supplies.
					Low	Wants to increase faculty housing in CBG's mining town.
					Low	Concerned about high food costs.
					Low	Some women have left their husbands for CBG workers.
					Low	Concerns over deterioration of rivers, streams, lakes and ponds.
Oct. 10	Mamadou Salio Diallo	Seed Co-Op	President	Sangaredi	Low	Hiring local young people.
					Low	Environmental pollution
					Low	Concerned that CBG will refuse to compensate people affected by the Extension Project
Oct. 10	Fatoumata Diallo	Market Garden Association	Representative	Sangaredi	Low	CBG does not participate in promoting women's intgegration within the labor market.
Oct. 10	Aissatou Bah	Market Garden Association	Staff	Sangaredi	Low	Environmental pollution.
Oct. 10	Mamadou Bah	Sector Bureau	Deputy Director	Hamdallaye	Low	Taking land without paying compensation equivalent to the harm caused.
Oct. 10	Thierno Mamadou Salio Bah	Mosque	Senior Imam	Hamdallaye	Low	Difficulty transporting village children to school.

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 10	3 Other People	-	Residents	Hamdallaye	Low	
Oct. 10	Thierno Alhassane Bah	District Bureau	Vice President	Boullere	Low	
Oct. 10	Mamadou Moktar Bah	District Bureau	Secretary	Boullere	Low	
Oct. 10	Mamadou Lamine Bah	District Bureau	Staff	Boullere	Low	
Oct. 10	Mamadou Dian Diallo	Islamic League	District Representative	Boullere	Low	
Oct. 10	El Hadh Abdouallaye Bah	Mosque	Senior Imam	Boullere	Low	
Oct. 10	Souaïbou Bah	-	Motorocycle Taxi Driver	Boullere	Low	
Oct. 10	9 Other People	-	Residents	Boullere	Low	
Oct. 10	Salia Bah	-	Village Chief	Mbouroré	Low	
Oct. 10	Boubacar Bah	Literacy Centre	Director	Mbouroré	Low	
Oct. 10	Mamadou Nouho Bah	-	Resident	Paragogo	Low	
Oct. 11	Mamadou Tela Bah	District Bureau	President	Sangaredi / Silidara	Low	No communication with CBG except complaints.
Oct. 11	El Hadji B Fofana	District Bureau	Vice President	Sangaredi / Silidara	Low	Erratic power supply.
Oct. 11	Boubacar Diallo	District Bureau	Secretary	Sangaredi / Silidara	Low	Sangaredi's young people must be hired.
Oct. 11	Souleymane Bah	-	Resident	Sangaredi / Silidara	Low	
Oct. 11	Samba Kodo Camara	District Bureau	President	Sangaredi / Tianskounnaye	Low	Problems with runoff drainage. The road must be built and runoff collection improved. Jobs.
Oct. 11	Ibrahima Sidibe	CBG	Director, HSE Mine, Sangaredi	Sangaredi	Medium	It is not possible to return land yet. People must be advised before conducting surveys. Problems with brushfires set by villagers.
					Medium	Increasing deforestation.
					Medium	Internal communication problems at CBG.
					Medium	Creation of an environmental problem management team.
Oct. 11	Satara Bah	District Bureau	President	Sangaredi / Lavage	Low	Has not liked CBG's ways of dealing with community through present.
					Low	Destruction of farmland.
					Low	No employment among local populace.
					Low	Destruction of hunting/gathering areas.

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
					Low	Decline in groundwater quality.
Oct. 11	Samba Diallo	Council of Elders	Staff	Sangaredi / Lavage	Low	
Oct. 11	Ousmani Bah	Council of Elders	Staff	Sangaredi / Lavage	Low	
Oct. 11	Thierno Bashir Barry	Sector Bureau	Secretary	N'Dantari	Low	Hiring young people partly in exchange for taking farmland.
Oct. 11	Almamy Malik Diallo	Sector Bureau	Councillor	N'Dantari	Low	Village cut off from world; needs bridge.
Oct. 11	Yaya Barry	Council of Elders	Elder	N'Dantari	Low	No access to water or electricity.
Oct. 11	Mamadou Oury Diallo	District Bureau	President	Sangaredi/ Bapa Sergent	High	Higher wages to CBG workers.
Oct. 11					High	Sangaredi water supply system inadequate, particularly in Bapa Sergent.
Oct. 11					High	Chapikhouré River no longer usable; runs dry more often.
Oct. 11					High	Reduced farmland in sector.
Oct. 12	Mamoudou Bah	Mosque	Second Imam	Kagnaka Sector of Wossou District	Low	
Oct. 12	Mamadou Saliou Barry	-	Resident	Kagnaka Sector of Wossou District	Low	
Oct. 12	Aboubacar Bah	-	Guide	Boundou Wande	Low	
Oct. 12	Kaouri Bowe Ba	-	Village Head of Household	Sintiourou Kaouri Bowe Ba (in Bosséré Sector of Balandougou)	Low	
Oct. 12	Ahmadou Bah	-	Resident	Lope (Balandougou Sector)	Low	
Oct. 12	Mamadou Bailo Diallo	-	Resident	Lope	Low	
Oct. 12	Abdoulaye Pathé Diallo	-	Resident	N'danta Fongné (Balandougou)	Low	
Oct. 12	Boubacar Diallo	District Bureau	President	Balandougou	Low	Local employment must be promoted. Many district residents have high school diplomas.
Oct. 12	Amadou Farda Diallo	Council of Elders	Dean	Balandougou	Low	

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 12	Mamadou Ouri Diallo	-	Resident (Driver)	Balandougou	Low	No compensation paid for damage caused by survey campaigns.
Oct. 12	Alpha Amadou Bah	-	Resident (Driver)	Balandougou	Low	Compensation must be paid for occupying the land.
Oct. 12	Mamadou Pathé Barry	-	Resident	Balandougou	Low	
Oct. 12	Mamadou Dian Diallo	-	Resident	Balandougou	Low	
Oct. 12	Younoussa Barry	-	Village Head of Household	Bosséré (Balandougou)	Low	
Oct. 12	Amadou Douga Diallo	-	Resident	Bosséré (Balandougou)	Low	
Oct. 12	Mamadou Bhoy Diallo	Mosque	Senior Imam	Boundou Wande	Low	River runs dry in dry season.
Oct. 12	Amadou Tidian Diallo	Mosque	Second Imam	Boundou Wande	Low	River too polluted for livestock of market gardening; reduced palm plantation production.
Oct. 12	Algassimou Bah	Sector Bureau	Deputy Director	Boundou Wande	Low	Blasting causes cracks to appear in houses.
Oct. 12	Amadou Dioulde Bah	Mosque	Muezzin	Boundou Wande	Low	Interferes with farming.
Oct. 12	Mamadou Celiou Camara / Diallo	Sector Bureau	Youth Representative	Boundou Wande	Low	Training and jobs as compensation for impact.
Oct. 12	Mamadou Aliou Bah	APAE	President	Boundou Wande	Low	Impediments to travel between several villages in September 2013.
Oct. 12	Abdoulaye Diallo	APAE	Vice President	Boundou Wande	Low	No compensation paid for damage caused by survey campaigns.
Oct. 12	14 Other People	-	Residents	Boundou Wande	Low	
Oct. 12	Souleymane Bah	-	Dean	Hore Lafou	Low	Water polluted by CBG survey campaigns.
Oct. 12	Abderamane Bah	-	Resident/Sangaredi Police Officer	Hore Lafou	Low	
Oct. 12	Idrissa Bah	Mosque	Third Imam	Hore Lafou	Low	
Oct. 12	Amadou Djoudjou Bah	Sector Bureau	Chief	Hafia 1	Low	
Oct. 12	Bailo Sangui Bah	District Bureau	Vice President	Hafia 1	Low	
Oct. 12	Mamadou Pathe Diallo	Sector Bureau	Chief/Blacksmith	Ndiarinde Roundé	Low	Lost access to farmland.
Oct. 12	Mane Aldjiouma	-	Karamoko/Healer	Ndiarinde Roundé	Low	
Oct. 12	Mamadiou Aliou Barry	Mosque	Muezzin	Ndiarinde Roundé	Low	
Oct. 12	Algassim Barry	-	Resident	Ndiarinde Misside	Low	
Oct. 12	Ibrahim Barry	Sector Bureau	Deputy Director	Ndiarinde	Low	

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
				Misside		
Oct. 12	Abdoulaye Barry	Sector Bureau	Youth Representative	Ndiarinde Misside	Low	
Oct. 12	Mamadou Ouri Diallo	Sector Bureau	Director	Sintiourou Hafia	Medium (Rumours among friends of CBG workers that number of trucks will increase)	Loss of farmland.
Oct. 12						Decline in groundwater quality/No more access to drinking water.
Oct. 12						Blasting produces dust that reduces crop output.
Oct. 12						Travel banned between the village and Sangaredi in September 2013.
Oct. 12	Mamadou Hafia Bah	-	Resident	Sintiourou Hafia	Low	Favor local hiring if Extension Project goes ahead.
Oct. 13	Ibrahim Sory Diallo	Sector Bureau	Director	Parawol Aliou	Low	
Oct. 13	Ousmane Bangoura	-	Resident	Parawol Aliou	Low	
Oct. 13	Amadou Oury Diallo	Council of Elders	Elder	Parawol Aliou	Low	No compensation paid for damage caused by survey campaigns.
Oct. 14	Mamadou Diakité	Sector Bureau	Directory	Sangaredi/Silidara/Dounsi	Low	New project will be welcome if it provides jobs for local youths.
Oct. 14	Mamadou Aliou Camara	Sector Bureau	Assistant Secretary	Sangaredi/Silidara/Dounsi	Low	Fear of additional damage to farmland.
Oct. 14	Amadou Ouri Bah	Sector Bureau	Director, Security	Sangaredi/Silidara/Dounsi	Low	
Oct. 14	Amadou Ouri Bah	Sector Bureau	Secretary	Sangaredi/Silidara/Dounsi	Low	
Oct. 14	Mamadou Lamarana Diallo	-	Guide	Sangaredi/Silidara/Dounsi	Low	
Oct. 14	Bassambatenen Bah	Sector Bureau	Deputy Director	N'Danta Fongné (Silidara)	Low	Rocks fall on houses during blasting at the adjacent quarry.
Oct. 14						Destruction of farmland.
Oct. 14						Groundwater pollution.

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 14						Inadequate compensation paid during 1986 relocation; worried about how much will be offered for new project.
Oct. 14						Wants bridge between Dounsi and N'Danta Fongné to be completed and source of water improved.
Oct. 14	Ibrahim Bah	Sector Bureau	Chief	Dounsi village	Low	
Oct. 14	Boubacar Bah	-	Resident	N'Danta Fongné (Silidara)	Low	
Oct. 14	Ibrahim Bah	-	Resident	N'Danta Fongné (Silidara)	Low	
Oct. 14	Seikou Oumar Toure	Sector Bureau	Deputy Director	Spoken Cogon	Medium (heard that reforested areas would be mined again)	No information. / Consultations with the communities before launching the reforestation program.
Oct. 14						No local employment
Oct. 14						Farmland damaged by mining; before CBG arrived, there was plenty of arable land, in contrast with today.
Oct. 14						Decline in quality of Cogon River water (runoff) throughout the subprefecture; no improvement despite reforestation.
Oct. 14	Mamadou Saliou Toure	-	Resident	Spoken Cogon	Low	
Oct. 14	Ibrahima Garanke Diallo	-	Resident	Spoken Cogon	Low	
Oct. 14	Aguibou Bah	Sector Bureau	Youth Director	Sambou	Low	
Oct. 14	Thierno Amadou Bah	-	Resident	Sambou	Low	
Oct. 14	Saliou Tenen Bah	Bureau	Village Chief	Passago	Low	
Oct. 14	Souleymane Bah	-	Resident	Passago	Low	
Oct. 14	Moktar Toure	-	Resident	Hore Sella 1	Low	
Oct. 14	Mamadou Lamarana N'Diaye	-	Resident	Hore Sella 2	Low	
Oct. 14	Mamadou Saliou Diallo	-	Resident	Hore Sella 2	Low	
Oct. 14	Abderamane Diallo	-	Resident	Daba	Low	
Oct. 14	Mamadou Dian Diallo	-	Resident	Daba	Low	

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 14	Mamadou Alou Diallo	-	Resident	Daba	Low	
Oct. 14	Thierno Bashir	-	Village Chief	Hore Sella 3	Low	
Oct. 14	Mamadou Saliou Bah	-	Village Chief	Sella Rounde	Low	
Oct. 14	Tola Senda	-	Resident	Sella Rounde	Low	
Oct. 14	Thierno Mamadou Bah	-	Resident	Sella Rounde	Low	
Oct. 14	Oumar Touré	-	Blacksmith	Madina Kambalaré	None	
Oct. 14	2 People	-	Residents	Filo Bowal	None	
Oct. 14	Sabou Camara	-	Dean	Doubi	None	Jobs only for CBG worker family members.
Oct. 14	Sadiouma Diallo	Sector Bureau	Sector Director	Tinguinlinta	None	Track monitoring and work.
Oct. 14	2 People	-	Residents	Gobiré	None	
Oct. 14	Abdoulaye Bah	-	Resident	Ballan	None	The train kills livestock.
Oct. 14	Mamadou Karfa Bah	-	Residents	Ballan	None	
Oct. 14	Abdoul Karim Diallo	Sector Bureau	Sector Director	Belli Thindi	None	The train kills livestock.
Oct. 14	1 Person	-	Residents	Bourundou Lengueré	None	
Oct. 14	1 Person	-	Residents	Tantouloumani	None	
Oct. 14	Moly Moussa Bangoura	Town Hall	Director, Technical Division	Boké	Rumor	
Oct. 14	Ibrahima Barry	Town Hall	Mayor	Boké	Average	CBG has made a big investment.
					Average	Overall disagreement with CBG on management style.
					Average	There is a difference between the amount of electricity being provided and that promised.
					Average	No direct communications. Occasional site inspections.
Oct. 14	Ibrahima Camara	Town Hall	Secretary General	Kolaboui	Radio	The site work should be completed.
Oct. 14	Malick Savané	Subprefecture	Assistant Subprefecture	Kolaboui	Rumor	There's no complaint mechanism; problems of communication.
Oct. 14	Ousmane Sangui Sampou	Town Hall	Facilitator	Kolaboui	Rumor	No money or motivation for the work.
Oct. 14	Siba Foster Koivogui	Town Hall	Local Development Officer	Kolaboui	Rumor	Access to tracks must restricted in towns.
Oct. 14	Youssef Ndiaye	Town Hall	Mayor	Tanéne	None	



Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 14	Ali Camara	Sector Bureau	Sector Director	Dawaf	None	The train is extremely noisy.
Oct. 14	Diallo	-	Resident	Taïbata	None	The train kills livestock.
Oct. 14	Boubacar Bah	-	Resident	Guidali	None	The train kills livestock.
Oct. 14	Cheick Ahmed Tidjane Diallo	-	Resident	Guidali	None	One person was killed on the trestle; there is no pedestrian walkway.
Oct. 14	Ibrahim Diallo	-	Resident	Guidali	None	A passover for people and motorbikes is needed.
Oct. 14	Sataba Kanté	-	Resident	Guidali	None	
Oct. 14	Dian Sadio Diallo	-	Resident	Guidali	None	
Oct. 14	Diallo	-	Resident	Sintiourou Madina	None	
Oct. 14	2 People	-	Resident	Diarabata	None	
Oct. 14	M'Bida	-	Resident	Sintiourou Hafia	None	
Oct. 14	2 People	-	Resident	Bingal	None	
Oct. 14	Hadja Aissata Traore	Subprefecture	Chairwoman, Women's League	Sangaredi	None	Wants good workers to get jobs, to prevent youth uprisings.
						Increase population and high prices.
						Worried about residents' lack of security.
Oct. 14	Fatoumata Keita	Town	City Councillor / Director, Sangaredi Soap Making and Dying	Sangaredi	None	Wants to establish a local women's bank.
						Environmental pollution/high risk of respiratory diseases.
Oct. 14	Lanciné Condé	CONAG	Subprefectural Inspector (Guinea National Corporation)	Sangaredi	None	Worried about high food prices.
Oct. 14	Souleymane Bamba	CONAG	Association Official	Sangaredi		CBG's refusal to pay compensation on lands it occupies.
Oct. 14	Thierno Bashir Diallo	Subprefectural Coordinator, Youth Associations	Secretary, External Affairs	Sangaredi	Less (former CBG contract workers)	Says local youths should get work because most have high school diplomas.
						Construction of a Youth Centre, run by young people.
						Compensation to the affected community.
						Increased export of local products.
						Worried about disappearance of environment and farmland.
Oct. 14	Jeannette Bangoura	CAAF (women's rights support center)	Director	Sangaredi	Less (her husband works for	Population increase; more girls in school.

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
					CBG)	
Oct. 16	Sherif Idrissa Camara	District Bureau	District President	Souka	None	No communication with CBG despite the survey campaigns.
Oct. 16	Ibrahima Camara	District Bureau	City Police	Souka	None	The project will bring in outsiders who have more skills than local people. This is a minus for the village.
Oct. 16	Satenen Camara	-	VIP	Souka	None	It's better that people who have to be relocated participate in the process rather than having it imposed on them by the company.
Oct. 16	Sabou Camara	-	Resident	Souka	None	No compensation paid for damage caused by the survey campaigns
Oct. 16	Aïssata Camara	-	Resident	Souka	None	
Oct. 16	Thierno Moktar Bah	Mosque	Imam	Souka	None	
Oct. 16	Daouda Kanté	-	VIP	Souka	None	
Oct. 16	Mamadou Houdi Bah	Health Center	agent de healthcare	Souka	None	
Oct. 16	Amadou Bah	-	Livestock Farmer	Petoum Coloni	None	Village cut off from world; needs roads.
Oct. 16	Tierno Sherif Diallo	-	Livestock Farmer	Wadiya	None	
Oct. 16	Alpha Oumar Bah	Sector Bureau	Sector Director	Wossou	None	CBG helps its workers, but does nothing for villagers.
Oct. 16	Thierno Ousmane Bah	-	Elder	Wossou	None	No communication
Oct. 16	Mamadou Boyi Bah	-	Elder	Wossou	None	No compensation paid for damage caused by the survey campaigns.
Oct. 16	El Hadji Siré Bah	-	Elder	Wossou	None	We can't refuse outsiders, but we need a quid pro quo.
Oct. 16	Mamadou Alfa Bah	-	Elder	Wossou	None	
Oct. 16	Mamadou Alpha Bah	-	Elder	Wossou	None	
Oct. 16	Mamadou Aliou Bah	Mosque	Imam	Wossou	None	
Oct. 16	Abdoulaye Bah	Mosque	Karamoko	Wossou	None	
Oct. 16	Mamadou Lamarana Bah	-	Elder	Wossou	None	
Oct. 16	Mamadou Lamarana Tella Bah	-	Elder	Wossou	None	
Oct. 16	Mohamed Lamine Bah	-	Elder	Wossou	None	
Oct. 16	Mariama Siré	-	Resident	Wossou	None	
Oct. 16	Aïssatou Bah	-	Resident	Wossou	None	

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 16	Abdoulaye Bah	-	Resident	Wossou	None	
Oct. 16	Souleymane Bah	-	Resident	Wossou	None	
Oct. 16	Amadou Oury Bah	-	Resident	Wossou	None	
Oct. 16	Alsan Bah	-	Resident	Wossou	None	
Oct. 16	Mamadou Kenda Diallo	-	Resident	Wossou	None	
Oct. 16	Amadou Lamarana Bah	-	Resident	Wossou	None	
Oct. 16	Kadiatou Bah	-	Resident	Wossou	None	
Oct. 16	Djeneba Silla	-	Resident	Wossou	None	
Oct. 16	Sallimatou Bah	-	Resident	Wossou	None	
Oct. 16	Mamadou Lamine Bah	-	Environmental Officer	Wossou	None	
Oct. 16	Mamadou Talibé Bah	Elementary School	Teacher	Wossou	None	
Oct. 16	Mamadou Bah	-	Elder	Kalinko Guessoré	None	No communication.
Oct. 16	Ansoumani Bah	-	Elder	Kalinko Guessoré	None	If there's an extension, villagers should get something in returns.
Oct. 16	Fatoumata Bah	-	Resident	Kalinko Guessoré	None	
Oct. 16	Mamadi Yero Bah	-	Resident	Kalinko Guessoré	None	
Oct. 16	Ibrahima Bah	Sector Bureau	Sector Director (Village Chief?)	Kalinko Guessoré	None	
Oct. 16	Mamadou Samba Kanté	Sector Bureau	Sector Director	Parawol	Rumor	Parawol residents were duped in 1970, because they were naive. No, CBG has to bargain with us if it wants to use our land.
Oct. 16	Saliou Dian Mané	-	Elder	Parawol	Rumor	The survey campaigns damage the land.
Oct. 16	Amadou Bah	-	Elder	Parawol	Rumor	Mo communication.
Oct. 16	Mamadou Bobo Touré	Mosque	Imam	Parawol	Rumor	We never got a response to the complaints we sent CBG.
Oct. 16	Dian Bailo Camara	-	Elder	Parawol	Rumor	CBG must come here to talk with us. We happened to learn about the project by overhearing some CBG workers.
Oct. 16	Samba Alarba Diallo	-	Resident	Parawol	Rumor	
Oct. 16	Abdoulaye Diallo	-	Resident	Parawol	Rumor	
Oct. 16	Mamadou Bhoye Barry	-	Village Facilitator / Guide	Sangaredi		

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 16	Mamadou Saliou Bah	Sector Bureau	Chief	Kahel M'Body		
Oct. 16	Mamadou Alimou Diallo	Mosque	Second Imam	Kahel M'Body		
Oct. 16	Sadaba Diallo	Council of Elders	Elder	Kahel M'Body		
Oct. 16	Souleymane Hawa Diallo	Sector Bureau	Youth Director	Kahel M'Body		
Oct. 16	26 Other People	-	Residents	Kahel M'Body		
Oct. 16	Alpha Oumar Bah	District Bureau	Staff	Kourawel	Low; hears about new housing construction in Sangaredi	Worried about additional damage to land.
Oct. 16	Satoun Bah	Council of Elders	Elder	Kourawel		Want jobs and basic infrastructure in compensation for damage caused.
Oct. 16	Abdul Karim Bah	-	OWINFS Village Facilitator	Kourawel		
Oct. 16	Mamadou Seydou Diallo	District Bureau	Youth Director	Kourawel		
Oct. 16	21 Other Participants	-	Residents	Kourawel		
Oct. 16	Abdoulaye Toure	-	Village Chief	Nyalé Djaïman		
Oct. 16	Mamadou Aliou Toure	-	Elder	Nyalé Djaïman		
Oct. 16	Djakariaore Bah	Sector Bureau	Sector Director	Nyalé Moussa		
Oct. 16	Koulibaly Souleymane	Council of Elders	Elder	Nyalé Moussa		
Oct. 16	Mamadou Oury Diallo	Sector Bureau	Chief	Nyalé Hogo		
Oct. 16	Abdoulaye Diallo	Sector Bureau	Staff	Nyalé Hogo		
Oct. 16	Thierno Mamadou Bobo Diallo	Council of Elders	Elder	Nyalé Hogo		
Oct. 16	Abdulaye Diallo	Sector Bureau	Chief	Nyalé Boussoura		
Oct. 16	Souleymane Touré	Youth Office	Staff	Nyalé Boussoura		
Oct. 16	Lamarana Diallo	-	Village Chief	Sintiourou Boussoura		
Oct. 16	Manga Bossy	-	Village Chief	Nyalé Missidé		
Oct. 16	Mamadou Aliou Diallo	-	Youth Director	Nyalé Missidé		
Oct. 17	Fode Mamadou	Subprefecture	Technical Director, Water and	Sangaredi	Low	Want to provide technical assistance to CBG

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
	Sako		Forests		(rumored)	reforestation campaigns.
Oct. 17	Ibrahima Diakhabi	Entreprise Prestation Agricole NGO (EPA)	Staff	Sangaredi	Medium (radio interview with CEO of CBG's Sangaredi mine)	Get more reforestation contracts from CBG.
						Increasing deforestation
Oct. 17	Amadou Dioulde Bah	-	Resident (little brother of village chief)	Daba Ley		
Oct. 17	Adama Hawa Bah	-	Resident (wife of village chief)	Daba Ley		
Oct. 17	Yero Djouma	-	Village Chief	Selawol		
Oct. 17	Yero Bah	-	Village Chief	Doumoun Cogon		
Oct. 17	Aboubacar Sané	District Bureau	President	Tanéné	None	Accidents with livestock on the tracks.
Oct. 17	Yousseuf Ndiaye	CR	Mayor	Tanéné	None	No communication.
Oct. 17	Babagalé Kaltamba	District Bureau	Vice President	Tanéné	None	Greater security alongside tracks.
Oct. 17	M Sampo	Subprefecture	Assistant Subprefecture	Tanéné	None	Microbinusses from Tanéné town should also be included.
Oct. 17	M Diallo	CR	Secretary General	Tanéné	None	We need a bridge or pedestrian/motorbike minibridge over the Tingilinta.
Oct. 17	Ibrahima Mané	Subprefecture	Director of Education	Tanéné	None	Pedestrian/motorbike footbridges over the tracks.
Oct. 17	Koumabssa Dit Oscar	Prefectural Development Committee	President	Boké	Average	Need walkie-talkies and keep a journal.
Oct. 17	Barry Mamadou Saliou Soko	Region	Business Inspector	Boké	Average	Have meetings and debates with media coverage.
Oct. 17	Ibrahima Kiniero Kourouma	Region	Environmental Inspector	Boké	Average	The towns must write through the Subprefectural Development Committee (CPD).
Oct. 17	Kandé Ibrahima Soumah	Region	Director, Human Resources	Boké	Average	CBG must report to the Subprefectural Development Committee (CPD)
Oct. 17	Pascal Dembadouno	Prefecture	General in Charge of the Mining Communities	Boké	Average	Commissions on all mining projects should be uniform.
Oct. 17	Alphonse Dopavogui	Youth Office	Youth Representative	Kondeyiré	None	Youths revolted against the CR government; they are not getting any investment.
Oct. 17	Michel Amara	-	Youth	Kondeyiré	None	Vibration and cracking.
Oct. 17	Idrissa Camara	-	Youth	Kondeyiré	None	Train is too noisy.
Oct. 17	Ismael Keita	-	Youth	Kondeyiré	None	

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 17	Aliou Daba	-	Youth	Kondeyiré	None	
Oct. 17	Alassane Keita	Sector Bureau	Assistant Director, Sector	Diendien Bourré	None	
Oct. 17	Souleyman Barry	Council of Elders	Elder	Diendien Bourré	None	
Oct. 17	Souleyman Keita	Council of Elders	Elder	Diendien Bourré	None	
Oct. 17	Abdul Karim Camara	Council of Elders	Elder	Diendien Bourré	None	
Oct. 17	Youth Group	-	Youths	Kakoumba	None	
Oct. 17	Sheikh Oumar Keita	Council of Elders	Elder	Segueya Sini	None	Noise and cracks in buildings because of train.
Oct. 17	Mohamed Bangoura	-	Resident	Danayah	None	Noise and cracks in buildings because of train.
Oct. 17	Mamadou Cissé	-	Big Brother Sector Director	Kiaye	None	Noise and cracks in buildings because of train.
Oct. 17	Cabo Cresse	Sector Bureau	Sector Director	Hamdallaye	None	Noise and cracks in buildings because of train.
Oct. 17	Hansouman Camara	Sector Bureau	Sector Director	Madina Toumbata	None	Noise and cracks in buildings because of train.
Oct. 17	Bafodé Fofana	Council of Elders	Elder	Madina Toumbata	None	
Oct. 17	El Hadje Mamadou Dansogo	Council of Elders	Elder	Madina Toumbata	None	
Oct. 17	Malick Camara	Council of Elders	Elder	Katomou	None	Noise and cracks in buildings because of train.
Oct. 17	Sekou Kouyate	-	Resident	Katomou	None	
Oct. 17	El Hadje Kouyate	Council of Elders	Elder	Katomou	None	
Oct. 17	Lamine Conté	Sector Bureau	Sector Director	Madina Bobof	None	Noise and cracks in buildings because of train.
Oct. 17	Mamadou Dian Conté	-	Big Brother Sector Director	Madina Bobof	None	
Oct. 18	Keoulen Kourouma	Subprefecture	Director, Quality Control	Kamsar	Low (Rumors)	High prices for household goods.
Oct. 18	Namori Keita	Subprefecture	Intern, Quality Control	Kamsar		Worried about shrinkage of small-scale fishing areas.
Oct. 18	Ibrahima Ogou	Prefecture	Director. Trade, Industry and Small Business	Boké	Low (Rumors)	Reduced small-scale fishing production.
Oct. 18	Dr. Ndiaye	CBG	Director, OHS	Kamsar	High	We have no direct ties with the community project.
Oct. 18	Dr. Ndiaye	CBG	Director, OHS	Kamsar	High	No environmental monitoring of village rivers and streams.
Oct. 18	Robert Ibaro Bangoura	Town Hall	Town Receiver	Kamsar	Low	Communication problems.
Oct. 18	Idrissa Camara	Town Hall	Sector Director, Kamsar II	Kamsar	Low	Selection of different investments under the Annual Investment Plan.

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 18	El Hadje Tidjane Sylla	Town Hall	Mayor	Kamsar	Low	Problems administering community property: none were resold.
Oct. 18	Djibril Tresor Bangoura	Town Hall	Town Councillor	Kamsar	Low	Electric power is too expensive because it is generated by diesel.
Oct. 18	Younoussa Doune Camara	Town Hall	Town Councillor	Kamsar	Low	The project will cause the population to increase, with an inflow of migrants; urban planning and services are required.
Oct. 18	Kourouma Samah Kaba	Subprefecture	Subprefecture	Kamsar	Average	Mo communication. CBG doesn't come to the Subprefecture office.
Oct. 18	Ibrahima Sorry Keita	CBG	Director, OHS	Kamsar	High	
Oct. 18	Stephane	CBG	Training Center	Kamsar	High	Could include service users and outside workers in training sessions.
Oct. 18	Mr. Barry	CBG	Training Center	Kamsar	High	A community communication unit is needed.
Oct. 18	Amadou Saikou Bah	Sector Bureau	Assistant, Chief	Lougal	None	
Oct. 18	Alpha Oumar Bah	Sector Bureau	Youth Representative	Lougal	None	
Oct. 18	Abdoul Karim Diallo	Elementary School	Teacher	Lougal	None	
Oct. 18	Lamarana Barry	-	Resident-Trader	Lougal	None	
Oct. 18	Boubacar Bah	-	Resident	Djoloun	None	
Oct. 18	Alpja Oumar Sall	-	Resident	Djoloun	None	
Oct. 18	Boubacar Sall	-	Village Chief	Djoloun	None	
Oct. 18	Amadou Ouri Bah	-	Village Chief	Sindiare Mangaya	None	
Oct. 18	Thierno Sadou Bah	-	Chief	Tala Bobhi	None	
Oct. 18	Mamadou Lamarana Bah	-	Resident	Tala Bobhi	None	
Oct. 18	Mamadou Kounsiwi Diallo	-	Chief	Ghaïga Diabere	None	
Oct. 18	El Hadj Mamadu Dian Diallo	Council of Elders	Elder	Ghaïga Diabere	None	
Oct. 18	Ibrahima Cissé	Elementary School	Principal	Ghaïga Diabere	None	
Oct. 18	Mamadou Lamarana Diallo	-	Resident	Ghaïga Diabere	None	
Oct. 18	Oury Dantawi Bah	-	Chief	Dantawi	None	
Oct. 18	Hamidou Bah	-	Resident	Dantawi	None	
Oct. 18	Rachidou Bah	-	Resident	Dantawi	None	
Oct. 18	Mamadou Sanoussi	-	Resident	Dantawi	None	

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
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Oct. 18	Mamadou Saliou Diallo	Sector Bureau	Chief	Sindiare Misside	None	
Oct. 18	Abdoul Gadiri Bah	-	Resident	Sindiare Misside	None	
Oct. 18	Ibrahima Sory	Sector Bureau	Staff	Sindiare Misside	None	
Oct. 18	Souleymane Diallo	-	Resident	Sindiare Misside	None	
Oct. 18	Ibrahima Sory Barry	-	Chief	Doukire Lopé	None	
Oct. 18	Mamadou Hatim Barry	-	Resident	Doukire Lopé	None	
Oct. 18	Yakouba Mané	-	Resident	Doukire Lopé	None	
Oct. 18	Amadou Bela Barry	Sector Bureau	Security	Pobadjel	None	
Oct. 18	Mamadou Alpha Bah	-	Resident	Pobadjel	None	
Oct. 18	Mamadou Douga Diallo	-	Chief	Madina Lopé	None	
Oct. 18	Boubacar Bah	-	Resident	Madina Lopé	None	
Oct. 18	Hawa Bella Bah	-	Village Facilitator	Bappa Sergent	None	
Oct. 19	Alassane Diallo	Sector Bureau	Youth Representative	Fofodoro	None	
Oct. 19	Mohamed Souma	Elementary School	Teacher	Fofodoro	None	
Oct. 19	Oudoussi Bah	-	Resident	Fofodoro	None	
Oct. 19	Mamadou Diallo	-	Grade School Student	Fofodoro	None	
Oct. 19	Salimatou Bah	-	Resident	Fofodoro	None	
Oct. 19	Ibrahima Karé Diallo	Sector Bureau	Chief	Karé	None	
Oct. 19	Mamadou Dian Diallo	Sector Bureau	Chief	Karé	None	
Oct. 19	Alceny Bah	Sector Bureau	Chief	Yala Dané	None	
Oct. 19	Mamadou Ouri Bah	-	Resident	Yala Dané	None	
Oct. 19	Almamy Mamadou Bah	Mosque	Imam	Yala Dané	None	
Oct. 19	Mamadou Ouri Bailo Bah	-	Resident	Yala Dané	None	
Oct. 19	Moktar Bah	-	Resident	Yala Dané	None	
Oct. 19	Souleymane Bah	-	Resident	Yala Dané	None	



Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 19	Mamadou Bhoye Bah	-	Resident	Yala Dané	None	
Oct. 19	Modi Idjou Bah	-	Chief	Wendou Baga	None	
Oct. 19	Mamadou Alpha Bah	-	Resident	Wendou Baga	None	
Oct. 19	Thierno Souleymane Bah	Council of Elders	Elder	Wendou Baga	None	
Oct. 19	Mamadou Mayatou Bah	-	Resident	Wendou Baga	None	
Oct. 19	Ibrahima Bah	-	Chief	Petoun Nyalbi	None	
Oct. 19	Mamadou Mouktar Bah	-	Resident	Petoun Nyalbi	None	
Oct. 19	Alceney Bah	-	Resident	Petoun Nyalbi	None	
Oct. 19	Amadou Bah	-	Chief	Pora Hodho	None	
Oct. 19	Mamadou Saliou Barry	Council of Elders	Elder	Pora Hodho	None	
Oct. 19	Souleymane Bah	Mosque	Muezzin	Pora Hodho	None	
Oct. 19	Mamadou Salio Bah	APAE	Staff	Pora Hodho	None	
Oct. 19	Amadou Dian Bah	Youth Bureau	Youth Secretary	Pora Hodho	None	
Oct. 19	Alhassane Diallo	-	Chief	Sintiourou Tiewere	None	
Oct. 19	Mamadou Tiewere Diallo	-	Resident	Sintiourou Tiewere	None	
Oct. 19	Mariam Bah	-	Resident	Sintiourou Tiewere	None	
Oct. 19	Saïkou Timbi Diallo	-	Chief	Sintiourou Saïkou Timbi	None	
Oct. 19	Malik Bah	-	Chief	Pora Bala	None	
Oct. 19	Ibrahima Bah	-	Resident	Pora Bala	None	
Oct. 19	Alpha Oumar Diallo	-	Chief	Filo Bowé	None	
Oct. 19	Mamadou Bobo Diallo	Mosque	Imam	Filo Bowé	None	
Oct. 19	Moustapha Diallo	-	Resident	Filo Bowé	None	
Oct. 19	Amadou Dane Diallo	District Bureau	President	Kourakoto	None	
Oct. 19	Mamadou Saraf Diallo	District Bureau	Staff and ATS	Kourakoto	None	
Oct. 19	Mamadou Lamarana Bah	-	Resident	Kourakoto	None	

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 19	Djibril Diallo	Council of Elders	Elder	Kourakoto	None	
Oct. 19	Abdoulaye Bah	Sector Bureau	Assistant Director, Sector	Guegueré	Rumors	No compensation paid when survey campaigns harm land.
Oct. 19	Thierno Mamadou Oury Bah	mosque	Imam	Guegueré	Rumors	Compensation must be paid for taking over the land.
Oct. 19	Amadou Sadjo Bah	Council of Elders	Elder	Guegueré	Rumors	Village facilitators would improve communications.
Oct. 19	Thierno Sidi Camara	Council of Elders	Elder	Fassaly Belenderé	Rumors	No relations with CBG.
Oct. 19	Mamadou Aliou Diallo	Council of Elders	Elder	Fassaly Belenderé	Rumors	Land damaged in survey campaigns and no compensation paid.
Oct. 19	Abdoulaye Diakité	-	Youth	Fassaly Belenderé	Rumors	We must have consideration for others.
Oct. 19	Ibrahima Coulibaly	-	Youth	Fassaly Belenderé	Rumors	They must give young people work if they are going to destroy our lands.
Oct. 19	Mamadou Dian Diallo	Mosque	Imam	Bandodji Tougouyé	None	The company can come, but with conditions.
Oct. 19	Thierno Dia Ndiaye	-	Father of the Sector Director	Bandodji Nyalbi	None	No relations with CBG.
Oct. 19	Ousman Ndiaye	Sector Bureau	Sector Director	Bandodji Nyalbi	None	The survey campaigns have done a great deal of damage to the land.
Oct. 19	Mamadou Saliou Bah	Council of Elders	Elder	Bandodji Nyalbi	None	The village must organize to speak with CBG and prevent what happened in Boundou Wanda.
Oct. 19	Mamadou Biko Camara	Council of Elders	Elder	Bandodji Nyalbi	None	We need compensation and jobs.
Oct. 19	Mamadou Yaya Bah	-	Youth	Bandodji Nyalbi	None	CBG makes promises it doesn't keep.
Oct. 19	Lamarana Camara	-	Youth	Bandodji Nyalbi	None	
Oct. 19	Abderahman Ndiaye	-	Youth	Bandodji Nyalbi	None	
Oct. 19	Abdoulaye Bah 1	-	Youth	Bandodji Nyalbi	None	
Oct. 19	Abdoulaye Bah 2	-	Youth	Bandodji Nyalbi	None	
Oct. 19	Mamadou Hadi Bah	-	Youth	Bandodji Nyalbi	None	
Oct. 19	Mamadou Pathé Diallo	-	Youth	Bandodji Nyalbi	None	
Oct. 19	Kanfori Bangoura	Council of Elders	Elder	Bosseré	None	No relations with CBG.
Oct. 19	Mohamed ALI Camara	Council of Elders	Elder	Bosseré	None	We need more information; the facilitators may have an idea.
Oct. 19	Samba Keita	Council of Elders	Elder	Bosseré	None	The survey campaigns have damaged the land

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 19	Souleyman Diallo	Council of Elders	Elder	Bosseré	None	They have to hire young people.
Oct. 19	Mamadou Saliou Bangoura	-	Youth	Bosseré	None	
Oct. 19	Djibril Bah	-	Youth	Bosseré	None	
Oct. 19	Djenebou Bah	-	Woman	Bosseré	None	
Oct. 19	Aïssatou Malado Tourré	-	Woman	Bosseré	None	
Oct. 19	Mariama Bienta Diallo	-	Woman	Bosseré	None	
Oct. 19	Aïssatou Diallo	-	Woman	Bosseré	None	
Oct. 19	Amadou Barry	-	Resident	Boundi Foullasso	None	CBG hasn't done anything for us.
Oct. 19	One Youth	-	Resident	Boundi Foullasso	None	
Oct. 19	Four Women	-	Resident	Boundi Foullasso	None	
Oct. 19	Ibrahima Diallo	District Bureau	Assistant, Youth Representative	Madina Djan	None	The houses has cracks from the blasting.
Oct. 19	Amadou Sara Diallo	District Bureau	Youth Representative	Madina Djan		When the land is strip, the filthy water of the Cogon floods the land.
Oct. 19	Samba Diouma Diallo	District Bureau	Town Police	Madina Djan		No local jobs.
Oct. 19	Mamadou Samba Camara	-	Resident	Madina Djan		Damage to farmland.
Oct. 19	Samba Diouma Diallo	-	Resident	Madina Djan		
Oct. 19	Mamadou Bailo Diallo	Council of Elders	Elder	Madina Djan		
Oct. 19	Amadou Ouri Diallo "Bembeya"	-	Representative of the Village Chief	Bembeya		A water inlet from the Cogon changed the community's life (occasional flooding near the village in the subprefecture).
Oct. 19	Abdulaye Bah	-	Elder	Sintiourou Abudlaye		Footbridge over the Cogon so the man villages on the Missira side can get their goods to Sangaredi (the people now walk two days to get to the Sangaredi market)
Oct. 19	Boubacar Hotia Diallo	-	Acting Veterinarian, Technical Husbandry Service	Missira		
Oct. 19	Alpha Oumar Diakite	Subprefecture	Subprefecture	Missira		Young people complain that CBG brings its own labourers to work on survey campaigns (issue raised at Téliélé prefecture level).
Oct. 19	Mamadou Bhoie Bah	Commune	Mayor (absent)	Missira		Expectations = jobs + better transportation access / road repair + basic infrastructure.
Oct. 19	Amid Diallo	Commune	Treasurer	Missira		

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 19	Bailo Cissé	Commune	Councillor	Missira		
Oct. 19	Ibrahima Diallo	Sector Bureau	Chief	Missira		
Oct. 19	Moussa Diop	-	Secretary, RPG	Missira		
Oct. 19	Alpha Talibe Diop	-	Secretary, GPT	Missira		
Oct. 20	El Hadje Dioulde Diallo	Town Hall	Mayor	Sangaredi	Medium	Both sides have got to start talking again.
Oct. 20	Mr. Tounkara	Town Hall	Secretary General	Sangaredi	Low	A coordination committee is needed.
Oct. 21	Samba Diouma Diallo	-	guide	Madina Djan		
Oct. 21	Thierno Mahmaoud Diallo	mosque	Imam	Bourreti		
Oct. 21	Boubacar Camara	Bureau du district	Staff	Bourreti		
Oct. 21	Mamadou Alpha Bah	-	Second Dean	Ndantari (Daramagnaki)		
Oct. 21	Alassane Camara	Youth Bureau	Youth Representative	Ndantari (Daramagnaki)		
Oct. 21	Ibrahima Sorry Bah	-	Dean	Sitako		
Oct. 21	Amatamou Bah	Youth Bureau	Youth Representative	Sitako		
Oct. 21	Mamoudou Bah	-	Chief	Sintiourou Daroul Dian		
Oct. 21	Hiero Dioulde Sane	Council of Elders	Elder	Kourani		
Oct. 21	Hiero Djouma Mane	Council of Elders	Elder	Kourani		
Oct. 21	Mama Saliou Toure	-	Resident	Kourani		
Oct. 21	Diambobo Barry	-	Resident	Thiankoye		
Oct. 21	Manga Yero Bah	Sector Bureau	Chief	Toumbeta		
Oct. 21	Mamadou Alpha Bah	Council of Elders	Elder	Toumbeta		
Oct. 21	Mamadou Bhoie Sow	Council of Elders	Elder	Dian Dian	Low (heard about INSUCO's public hearings)	Primary expectation = jobs for youth
Oct. 21	Mamadou Yaya Bah	Council of Elders	Elder	Dian Dian		Second expectation = new schools, vocational/literacy training center, wells, 1 health clinic
Oct. 21	Ibrahima Bah	Council of Elders	Elder	Dian Dian		Worried about blasting campaigns.
Oct. 21	Mamadou Gando Sow	Youth Bureau	Youth Representative	Dian Dian		Doesn't want compensation to go through the town or subprefectural governments, but be directly

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
						negotiated/paid at the district level.
Oct. 21	Mamadou Bhoie Bah	Sector Bureau	Security	Dian Dian		Worried about loss of land without viable alternative.
Oct. 21	Mamadou Bailo Bah	-	Resident	Dian Dian		
Oct. 21	Mamadou Issa Bah	-	Resident	Dian Dian		
Oct. 21	Djibril Diallo	Elementary School	Teacher	Dian Dian		
Oct. 21	6 Other People	-	Residents	Dian Dian		
Oct. 21	Mamadou Gando Bah	-	Technical Health Officer	Gaïdhe Djeli		
Oct. 21	Amadou Ouri Bah	Council of Elders	Elder	Hounsire		
Oct. 21	Alhassane Bah	Sector Bureau	Chief and Secretary, Dian District	Limbiko		
Oct. 21	Amadou Seikou Ba	-	Dean	Kareda Bel		Compensation for lost work, not for land taken.
Oct. 21	Mamadou Ouri Bah	-	Resident	Kareda Bel		
Oct. 21	Mamadou Saliou Bah	-	Recent High School Graduate	Kareda Bel		
Oct. 21	Amadou Bailo Bah	Sector Bureau	Chief and Secretary, Madina Dian District	Missira		
Oct. 21	Irabhima Lamarana Balde	-	Resident	Pora PK 130		
Oct. 21	Thierno Lama Souka Bah	Council of Elders	Elder	Kalinko Poutaï		
Oct. 21	Yero Djouma Diallo	Sector Bureau	Chief	Gnangaba		
Oct. 21	Amadou Ouri Maro	-	Resident	Gnangaba		
Oct. 21	Yero Diallo	-	Resident	Gnangaba		
Oct. 21	Mamadou Aliou Diallo	Sector Bureau	Staff	Gnangaba		
Oct. 21	Mamadou Oudi Bah	Sector Bureau	Chief	Kalinko ley		
Oct. 21	Moustapha Bah	-	Chief	Sintiourou Madina		
Oct. 21	Amadou Tidiane	-	Chief	Sintiourou Hafia		
Oct. 21	Mamadou Moumini Bah	Sector Bureau	Assistant, Youth President	Kalinko Ley		
Oct. 21	Thierno Mamadou Aliou	Council of Elders	Elder	Kalinko Ley		
Oct. 21	Lama Toure	Sector Bureau	Chief	Telibofi		

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
Oct. 21	Negue Diallo	Council of Elders	Elder	Telibofi		
Oct. 21	Mamadou Foula Diallo	-	Chief	Carrefour Gnangaba		
Oct. 21	Ibrahima Sory Sidibe	-	Chief	Kankalaré		
Oct. 21	Samba Sidibe	Sector Bureau	Chief of all Halmets in Parawi Saleah and Parawi	Parawi Saleah 1		
Oct. 21	Younoussa Sidibe	-	Founder of Parawi	Parawi Saleah 1		
Oct. 21	Thierno Sidibe	-	Resident	Parawi Saleah 1		
Oct. 21	Harouna Sidibe	-	Resident	Parawi Saleah 1		
Oct. 21	Dian Sadjou Touré	-	Chief	Parawi Saleah 4		
Oct. 21	Yakouba Keita	-	Chief	Parawi		
Oct. 21	Fode Bailo Diallo	-	Chief	Feto Parawi 2		
Oct. 21	Sara Mané	-	Resident	Feto Parawi 2		
Oct. 21	Pété Camara	-	Chief	Sintiourou Barkéré		
Oct. 21	Mariama Keita	-	Resident	Sintiourou Barkéré		
Oct. 21	Nene Galé Camara	-	Resident	Sintiourou Barkéré		
Oct. 21	Adama Bah	-	Resident	Sintiourou Barkéré		
Oct. 21	Ansata Dané Camara	-	Resident	Sintiourou Barkéré		
Oct. 21	Mariam Koulibali	-	Resident	Sintiourou Barkéré		
Oct. 21	Ramatoulaye Camara	-	Resident	Sintiourou Barkéré		
Oct. 21	Fode Bailo Diallo	Sector Bureau	Chief	Feto Parawi		
Oct. 21	Facinet Camara	Subprefectural Department of Trade and Small Business	Director	Kamsar	Less (Speech by CBG's CEO)	Respiratory diseases caused by smoke from the plant.
Oct. 21	Mory Laye Foté Soumah	Regional Coordination of Boké's Traditional Fishers	Regional Coordinator	Kamsar	Less (TV speech by Guinea's president)	Increase marine security staff.
Oct. 21	Aboubacar Camara	Port of Kamsar	Vice President	Kamsar	Less (TV	Jobs for young people.

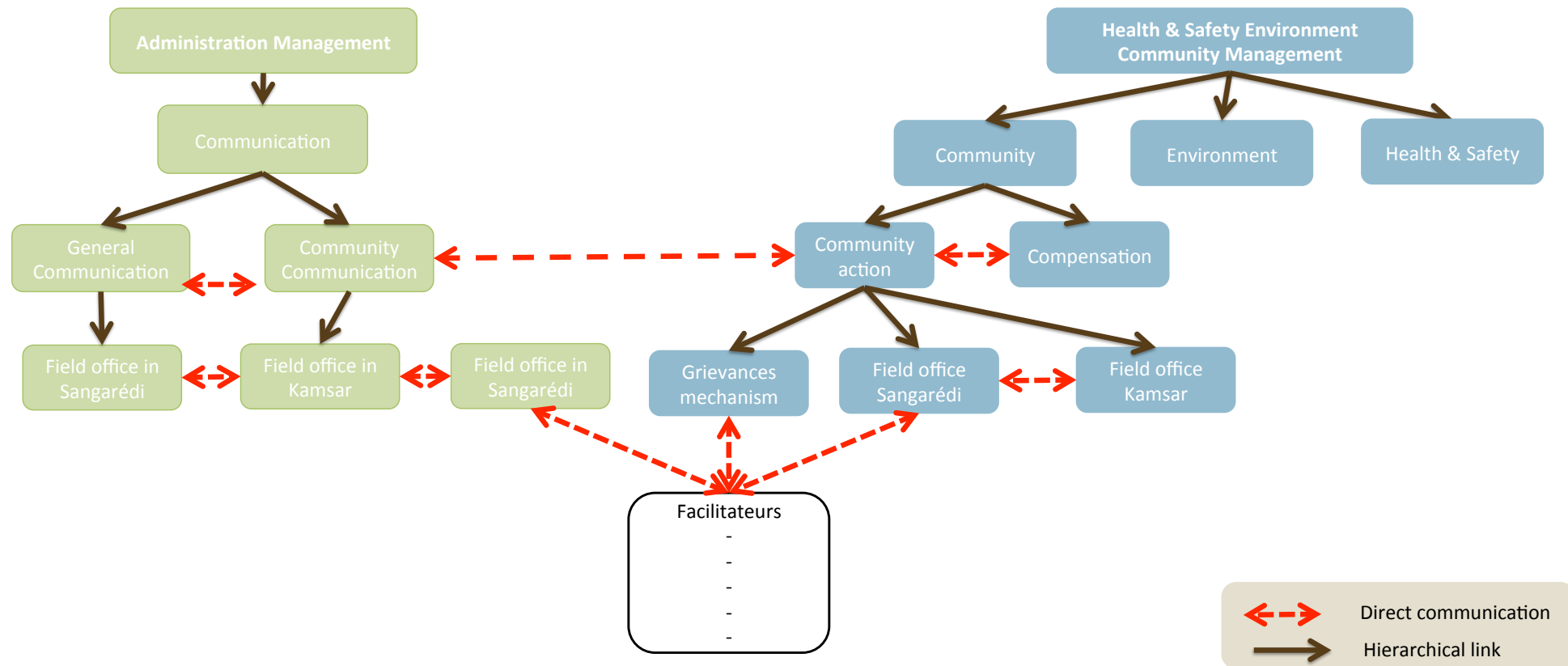
Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
					speech by Guinea's president)	
Oct. 21	Fodé Berete Camara	Port of Kamsar	Chief	Kamsar		More health facilities and schools.
Oct. 21	Mamadou Camara	Prefectural Department of Fisheries	Director	Kamsar	Less (TV speech by Guinea's president)	Big ships may cause large fish to disappear.
Oct. 21	Jean Faustin Camara	Prefectural Department of Fisheries	Deputy Director	Kamsar	Less (TV speech by Guinea's president)	Port breakwaters will make water levels rise.
Oct. 21	Mamadouba Sogueta Camara	Kamsar Town Government	Secretary General	Kamsar	Less (TV speech by Guinea's president)	Population increase, high prices for household goods.
Oct. 21	Amadou Sissoko	Chamber of Commerce	Member Responsible for Disputes and Social Affairs	Kamsar	Less (TV speech by Guinea's president)	Popular discontent will soar.
Oct. 21	Yousseuf Bangoura	Chamber of Commerce	Assistant, Responsible for Social Affairs and Conflicts	Kamsar		Put a cap on CBG 's activities.
Oct. 21	El Hadj Boubacar Dara Baldé	Chamber of Commerce	President	Kamsar		Respiratory disease cause by smoke from the plant.
Oct. 21	Oumou Coya Camara	Sahara Women's Market Association of Kamsar	Chair	Kamsar		Fear inflation
Oct. 22	Koumbassa Sanoussy	SONECI Microbusiness (Industrail Dredging and Cleaning)	Director, HR	Kamsar	Less (Speech by CBG's CEO)	Seeks jobs for youth.
Oct. 22	Ahmed Yomba Tore	SONECI	Accountant	Kamsar		Fear inflation and cracks in buildings.
Oct. 22	Abdulaye Sané	SOCOREM Microbusiness	Director, HR	Kamsar		Seek cooperation between microbusinesses and port extension crews.
Oct. 22	Kadiatou Sow	SONECI	Secretary	Kamsar		Worried about environmental pollution.
Oct. 22	Mariam Barry Camara	SOCANE Microbusiness	Bureau Staff	Kamsar		
Oct. 22	Seidouba Keita	SOCANE	Bureau Staff	Kamsar		
Oct. 22	Sory Sano	SOCOREM	Bureau Staff	Kamsar		
Oct. 22	Asma Diaby	SOCANE	Bureau Staff	Kamsar		
Oct. 22	James Dean	SONECI	President	Kamsar		

Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
	Mansaré					
Oct. 22	Lamine Soumah	SOCOREM	Bureau Staff	Kamsar		
Oct. 22	Mariam Diallo	SOCOREM	Bureau Staff	Kamsar		
Oct. 22	Gnama Condé	Women Teachers' Socio-Educational Development Association	Chair	Kamsar	Less (Speech by CBG's CEO)	Wants CBG to help associations and women's groups.
						Help schools get cafeterias.
						Wants school for young girls to be built.
						Wants a large market built.
Oct. 22	Lama Sidiki Doumbouya	Civil Society Bureau	President	Kamsar	Less (TV speech by Guinea's president)	Wants more middle and high schools.
Oct. 22	M'mah Bangoura	Civil Society Bureau	Vice President	Kamsar		Worried about lack of security in the city.
Oct. 22	Bangoura Saidou Ba	Subprefecture	Assistant Deputy Prefect	Daramagnaki	None	We must establish communication.
Oct. 22	Mamadou Yébé Diallo	Town Hall	Second Deputy Mayor	Daramagnaki	None	CBG must start paying surface tax.
Oct. 23	M'balou Traoré	Delegation of High School Teachers	Public Records Keeper	Kamsar	Less (Speech by CBG's CEO)	Inadequate farm/grazing land.
Oct. 23	Yaya Camara	Delegation of High School Teachers	Delegate	Kamsar		Wants assistance for education and school suppliers.
Oct. 23	Yousseuf Diallo	Delegation of High School Teachers	Assistant Delegate	Kamsar		
Oct. 23	Tidjane Soumah	Delegation of High School Teachers	Secretary	Kamsar		
Oct. 23	Salif Bangoura	Delegation of High School Teachers	Second Public Records Keeper	Kamsar		
Oct. 23	Mamadou Bangoura	AIGLES NGO	Coordinator	Kamsar	Less (Speech by CBG's CEO)	Hire local youth.
Oct. 23	Mamadou Barry	AIGLES NGO	Director, Training	Kamsar		Environmental pollution.
Oct. 23	Aly Dembo Camara	AIGLES NGO	Administrative Secretary	Kamsar		Wants assistance from the youth NGO.
Oct. 23	Kémoko Touré	CBG	CEO	Kamsar	High	The government must play its role. CBG is Guinea's biggest taxpayer.
Oct. 23	Kémoko Touré	CBG	CEO	Kamsar	High	Microbusiness are an engine of economic development.
Oct. 23	Kémoko Touré	CBG	CEO	Kamsar	High	Rural communities must play their part in



Date	Name	Organization	Title	Community	Amount of information	Comments on Extension Project
						maintaining infrastructure.
Oct. 23	Kémoko Touré	CBG	CEO	Kamsar	High	Promised to fund better worker living conditions.
Oct. 23	Kémoko Touré	CBG	CEO	Kamsar	High	CBG fights corruption and is in good standing with the FCPA.
Oct. 23	Kémoko Touré	CBG	CEO	Kamsar	High	We need good communication, with greater community input.
Oct. 24	Robert Max Aublet	CBG	Director, Communications	Kamsar	High	More community input.
Oct. 24	Robert Max Aublet	CBG	Director, Communications	Kamsar	High	OHS team could trade community units.
Oct. 24	Dominique Traoré	CBG	Director, Taxation	Kamsar	High	There were proposals on resolving the tax dispute; we have to sit down with the government to come to an agreement.
Oct. 24	Ms. Dramé Aïcha Barry	CBG	Director, Administration	Kamsar	High	Want more community input.
Oct. 24	Ms. Dramé Aïcha Barry	CBG	Director, Administration	Kamsar	High	Town Halls demands largely exceed what CBG and the <i>Local Government Code (code des collectivités)</i> can do.
Oct. 24	Alpha Keita	CBG	Director, Community Project	Kamsar	High	The state is a stakeholder. It can't abandon the mining towns.
Oct. 24	Ms. Sangaré	CBG	Representative, Community Project	Kamsar	High	Guidelines and urban plans are needed.
Oct. 25	Mr. Faza Diallo	CADI	Representative of Boké Residents	Conakry	None	Problems of communication with CBG. Elected officials should have more authority.
Oct. 25	Kabinet Cissé	CECIDE	Director	Conakry	None	The people must be informed of their rights and duties.
Oct. 25	Abdoulaye Diallo	CECIDE	Director, Natural Resources	Conakry	None	Community leaders should be taught basic legal concepts.
Oct. 25	Mr. Diaby	CECIDE	Staffs	Conakry	None	Mining regulations should be the same throughout Guinea.

## APPENDIX 2: ORGANIZATION CHART FOR CONSIDERATION



### **APPENDIX 3: PREFECTURAL COMMITTEE PROPOSAL ON MONITORING MINING ACTIVITIES**

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The prefecture has a key role to play in monitoring and to some extent overseeing the sector's mining activities.

The prefecture has numerous commissions and committees, each of which monitors these firms' operations (CBG organized a joint mine impact study committee, as in Kabata, with GAC).

To harmonize practices throughout the Prefecture and in view of the many concerned parties, the Prefecture should organize all these activities, in one committee, particularly those concerning populations, social development and joint action.

Such a committee could be called the Prefectural Mining Monitoring Committee (Comité Préfectoral des Suivi des Actions des Miniers or CoPSAM). The committee would enforce compliance with agreements of the various parties (CBG and the association and community sector) and to verify the lawfulness of actions performed and their compliance with Guinea's laws.

This committee would also serve to bring together key stakeholders and ensure formal communication among them, while launching a participatory process for implementing community activities.

#### **The permanent bureau's composition could be:**

- Secretary General of Decentralized Communities: Chair, who presides over meetings and at all times represents the committee and assume responsibilities for its decisions.
- Prefecture Director of the Environment: Committee Report, who takes all meeting minutes and effective transits information within the committee and with outside parties.
- Prefecture Director, Mines: A member of the permanent bureau, the Prefecture Director will attend all committee meetings and pledges as a permanent staff member to implement all decisions made/approved by the committee.
- Mayor of Concerned Towns: A staff member, will attend all committee meeting and pledges as a permanent staff member to implement all

decisions made/approved by the committee. Interfaces with the community, the prefectural committee and the community.

- Community Secretary of Concerned Communities: A staff member who participates in all committee meetings and pledges as a permanent staff member to implement all decisions made/approved by the committee. Interfaces with the decentralized administration and community.
- Prefectural Director of Agriculture: Permanent office staff who attends all committee meetings participates in all committee meetings and pledges as a permanent staff member to implement all decisions made/approved by the committee.
- Prefectural Director, Urban Planning and Environment: Permanent office staff who attends all committee meetings participates in all committee meetings and pledges as a permanent staff member to implement all decisions made/approved by the committee.
- CBG Representative: Permanent office staff who attends all committee meetings participates in all committee meetings and pledges as a permanent staff member to implement all decisions made/approved by the committee.
- Association Sector Representative(s): Permanent office staff who attends all committee meetings participates in all committee meetings and pledges as a permanent staff member to implement all decisions made/approved by the committee.

### **Expanded Office:**

Expanded office staff are responsible for taking action on all topics that concern them, at the request of a member of the Permanent Office or a project stakeholder. A few examples follow.

- Prefecture Director, Healthcare.
- Prefecture Director, Education.
- Prefecture Director, Surface Transportation
- Prefecture Director, Water and Forests.
- Prefecture Director, Public Works.
- Prefecture Director, Microprojects.
- Prefecture Director, Planning.
- Prefecture Director, Woman's and Children's Rights.

- Labour and Employment Standards Bureau.
- Judge.
- Presidents of districts concerned.
- Local, regional and national media.

### **Prefectural Commissions Role**

- The commission moderates discussions and negotiations among stakeholders. The prefectural committee endorses agreements with stakeholders and ensures their compliance with Guinean legislation.
- The commission must ensure compliance with its decisions, either directly itself or by mobilizing decentralized subprefectural authorities.
- As its makeup suggests, this commission may call on all or part of its membership, depending on need. The commission is empowered to produce and validate itself such technical documents and technical charts and plans.
- The commission makes recommendations about the project, which are the presented for discussion with the other stakeholders (local committees, local communities, CBG, association sector and workforce).
- This commission should help follow up on on complaints against CBG and may be involved in their resolution if are more than purely local.
- This commission must not be involved in benefit award or compensation payment decisions.
- This commission shall not replace community consultation, but may follow actions stemming from them.
- This commission must be in contact with the Prefectural Development Committee (CPD) which plays an advisory role among the communities.

### **Prefectural Commission**

CBG will pay commission staff per diems according to CBG's fee grid, to enable the staff to conduct its mission of expertise and validate PARC's different implement phases and in compensation for the extra work incurred.

The committee chair will acquire a permanent or expanded staff. The per diem will be paid individually, to the person working, by CBG, at a pre-established rate.

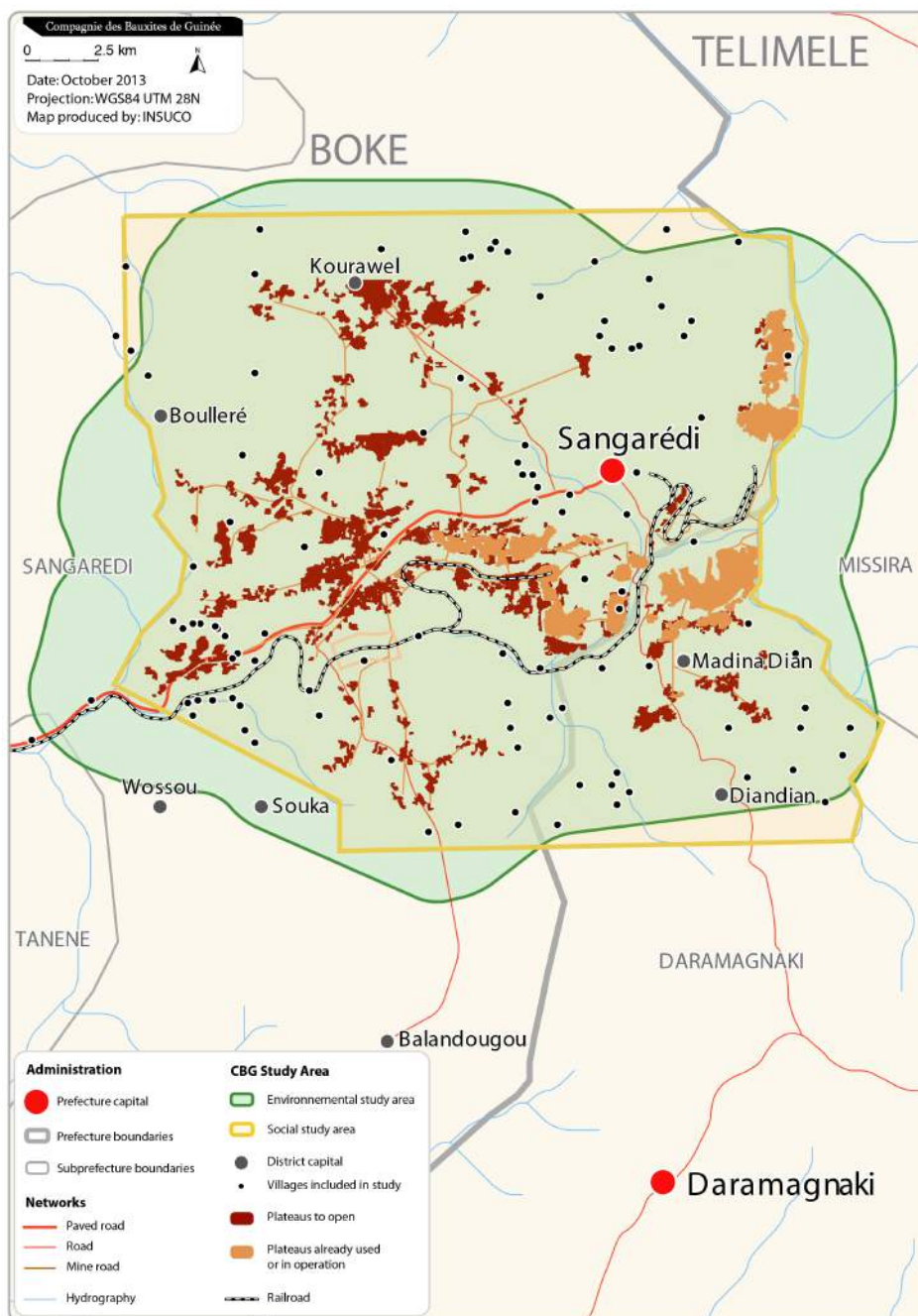
This provision will be the subject of a written agreement between CBG and the committee, with the precision terms for paying and spending the budget to be determined.

## APPENDIX 4: SAMPLE INDICATORS

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Section	Indicator	Source	Jan-14	Feb-14	Mar-14	Apr-14
Grievances tracking	Number of grievances recorded.	Grievance register				
	Number of grievances treated by category.	Grievance register				
	Number of closed grievances by category and resolution outcome.	Grievance register				
	Number of grievances sent to legal system.	Grievance register				
Communication	Number of information actions completed.	Reoirt				
	Number of radio messages broadcasted.	Listeners, archive, contract				
	Number of information meeting held	Minutes				
Community issues	Number of awareness raising actions completed	Report				
	List of main issues raised during period	Database of consultation documentation				

## APPENDIX 5 : MAP OF STUDY AREA WITHIN THE MINING CONCESSION





### APPENDIX 6: KEY STAKEHOLDERS

Subprefecture	District	Community	Type	Name	Organization	Title	Information quality
<b>ALL SECTORS</b>							
			Economy	Ibrahima Ogou	Prefecture	Director. Trade, Industry and Small Business	Low (Rumors)
			Economy	Kandé Ibrahima Soumah	Region	Director, Human Resources	Average
			Economy	Barry Mamadou Saliou Soko	Region	Business Inspector	Average
			Economy	Koumabssa (known as "Oscar")	Prefectural Development Committee	President	Average
			Environment	Ibrahima Kiniero Kourouma	Region	Environmental Inspector	Average
			Governor	Siba Severin Lolamou	Governorate	Governor	Medium
			Governorate	Samba Fraterna Barry	Governorate	Chief of Staff	Low
			Governorate	Ousmane Diallo	Governorate	Policy Adviser	Low
<b>ZONE 1</b>							
Sangaredi			Administration	Aminata Toure	Subprefecture	Public Records Keeper	Low
Sangaredi			Agriculture and Fishing	Fatoumata Boke Barry	Subprefecture	Director livestock	Low (rumors among CBG workers)
Sangaredi			Agriculture and Fishing	Mamadou Salio Diallo	Seed Co-Op	President	Low
Sangaredi			Agriculture and Fishing	Aissatou Bah	Market Garden Association	Staff	Low
Sangaredi			Agriculture and Fishing	Ismael Camara	Subprefecture	Agricultural Adviser	Low
Sangaredi			Agriculture and Fishing	Fatoumata Diallo	Market Garden Association	Representative	Low
Sangaredi			Planning	Aboubacar Conte	Subprefecture	Officer, Urban Planning and Environment	Low
Sangaredi			Planning	Mamadou Hadi Balde	Subprefecture	Director, Urban Development and Environment	Low

Sangaredi			Civil Society Bureau	Bah Mamadou	Civil Society Bureau	Staff	Low
Sangaredi			Sector Bureau	Mamadou Bah	Sector Bureau	Deputy Director	Low
Sangaredi			Sector Director	Cabo Cresse	Sector Bureau	Sector Director	None
Sangaredi			CR	Mamadou Alpha Tounkara	CR	Secretary General	Low
Sangaredi			Economy	Mamadou Ouri Diallo	CR	Local Development Officer	Low
Sangaredi			Economy	Boubacar Bah	Bowé services (Microbusiness)	Director	Low
Sangaredi			Economy	Souleymane Bamba	CONAG (Guinea National Corporation)	Association Official	
Sangaredi			Education	Moustapha Conde	Subprefecture	Assistant, Director of Education	Low
Sangaredi			Environment	Moussa Camara	Subprefecture	Officer, Department of the Environment	Low
Sangaredi			Environment	Moussa Camara	Subprefecture	Officer, Department of the Environment	Low
Sangaredi			Environment	Sako Fode Mamoudou	Subprefecture	Camp Director Water and Forests	Low
Sangaredi			Environment	Mariam Diallo	Subprefecture	Director, Environment	Low
Sangaredi			Environment	Alama Conté	Subprefecture	President de Cogon-Tingilint Watershed Committee	Low
Sangaredi			Environment	Fode Mamadou Sako	Subprefecture	Technical Director, Water and Forests	Low (par des Rumors)
Sangaredi			Women	Hadja Aissata Traore	Subprefecture	Chairwoman, Women's League	None
Sangaredi			Youth	Fara Nestor Leno	Subprefecture	Director, Rural Development / Responsible for Youth and Sports	Medium (information on CBG radio)
Sangaredi			Youth	Thierno Bashir Diallo	Subprefectural Coordinator, Youth Associations	Secretary, External Relations	Less (former CBG contract worker)
Sangaredi			Mayor	El Hadj Mamadou Dioulde Bah	CR	Mayor	Low

Sangaredi			Town Hall	Mr. Tounkara	Town Hall	Secretary General	Low
Sangaredi			Town Hall	Fatoumata Keita	Town	City Councillor / Director Sangaredi Soap Making and Dying	None
Sangaredi			NGO	Ibrahima Diakhabi	Entreprise Prestation Agricole (EPA), Farm Service Company, an NGO	Staff	Medium (radio interview with the CEO of CBG's Sangaredi mine)
Sangaredi			President, District Bureau	Mamadou Oury Diallo	District Bureau	President	High
Sangaredi			President, District Bureau	Samba Kodo Camara	District Bureau	President	Low
Sangaredi			Religious	Thierno Mamadou Salio Bah	Mosque	Senior Imam	Low
Sangaredi			Healthcare	Mamadou Lamarana Diallo	Enhanced Health Clinic	Director, Hospitalization	Low
Sangaredi			Healthcare	Saa Mamadou Kamano	Enhanced Health Clinic	Director Expanded Vaccination Program	Low
Sangaredi			Healthcare	Dr. Fatoumata Bah	Enhanced Health Clinic	Lab Chief	Low
Sangaredi			Healthcare	Dr. Yacine Diallo	Hospital (CBG)	Director	High (interview with CEO)
Sangaredi			Healthcare	Kadiatou Aidara	Enhanced Health Clinic	Representative, Maternity Department	Low
Sangaredi			Healthcare	Aissatou Sadio Diallo	Enhanced Health Clinic	Sales Clerk	Low
Sangaredi			Subprefecture	Mambinti Sako	Subprefecture	Assistant Subprefecture	Low
Sangaredi			Subprefecture	Moussa Camara	Subprefecture	Director, Quality Control and Standards	Low
Sangaredi			Subprefecture	Moussa Camara	Subprefecture	Director, Quality Control and Standards	Low
Sangaredi			Subprefecture	Sandaly Toure	Subprefecture	Labour Inspector	Low
Sangaredi			Subprefecture	Kaourou Camara	Subprefecture	Subprefecture	Medium
Daramagnaki			Town Hall	Mamadou Yébé Diallo	Town Hall	Second Deputy Mayor	None
Daramagnaki			Assistant Deputy Prefect	Bangoura Saidou Ba	Subprefecture	Assistant Deputy Prefect	None

Daramagnaki	Dian Dian	Dian Dian	Sector Bureau	Mamadou Bhoie Bah	Sector Bureau	Security	
Daramagnaki	Dian Dian	Dian Dian	Council of Elders	Ibrahima Bah	Council of Elders	Elder	
Daramagnaki	Dian Dian	Dian Dian	Council of Elders	Mamadou Bhoie Sow	Council of Elders	Elder	Low (heard about public hearings held by INSUCO)
Daramagnaki	Dian Dian	Dian Dian	Council of Elders	Mamadou Yaya Bah	Council of Elders	Elder	
Daramagnaki	Dian Dian	Dian Dian	Education	Djibril Diallo	Elementary School	Teacher	
Daramagnaki	Dian Dian	Dian Dian	Youth	Mamadou Gando Sow	Youth Bureau	Youth Representative	
Daramagnaki	Dian Dian	Gaidhe Djeli	Healthcare	Mamadou Gando Bah	-	Technical Health Officer	
Daramagnaki	Dian Dian	Hounsire	Council of Elders	Amadou Ouri Bah	Council of Elders	Elder	
Daramagnaki	Dian Dian	Kourawi	Council of Elders	Hiero Dioulde Sane	Council of Elders	Elder	
Daramagnaki	Dian Dian	Kourawi	Council of Elders	Hiero Djouma Mane	Council of Elders	Elder	
Daramagnaki	Dian Dian	Limbiko	Village Chief	Alhassane Bah	Sector Bureau	Chief and Dian Dian District Secretary	
Daramagnaki	Dian Dian	Petoun Nyalbi	Village Chief	Ibrahima Bah	-	Chief	None
Daramagnaki	Dian Dian	Pora Bala	Village Chief	Malik Bah	-	Chief	None
Daramagnaki	Dian Dian	Pora Hodho	Village Chief	Amadou Bah	-	Chief	None
Daramagnaki	Dian Dian	Pora Hodho	Council of Elders	Mamadou Saliou Barry	Council of Elders	Elder	None
Daramagnaki	Dian Dian	Pora Hodho	Education	Mamadou Salio Bah	APAE (Parents of Grade School Students and Supporters Association)	Staff	None
Daramagnaki	Dian Dian	Pora Hodho	Youth	Amadou Dian Bah	Youth Bureau	Youth Secretary	None
Daramagnaki	Dian Dian	Pora Hodho	Religious	Souleymane Bah	Mosque	muezzin	None
Daramagnaki	Dian Dian	Sintiourou Daroul Dian Dian	Village Chief	Mamoudou Bah	-	Chief	
Daramagnaki	Dian Dian	Sintiourou Saikou Timbi	Village Chief	Saïkou Timbi Diallo	-	Chief	None
Daramagnaki	Dian Dian	Sintiourou Tiewere	Village Chief	Alhassane Diallo	-	Chief	None

Daramagnaki	Dian Dian	Toumbeta	Village Chief	Manga Yero Bah	Sector Bureau	Chief	
Daramagnaki	Dian Dian	Toumbeta	Council of Elders	Mamadou alpha Bah	Council of Elders	Elder	
Daramagnaki	Dian Dian	Wendou Baga	Village Chief	Modi Idjou Bah	-	Chief	None
Daramagnaki	Dian Dian	Wendou Baga	Council of Elders	Thierno Souleymane Bah	Council of Elders	Elder	None
Daramagnaki	Madina Dian		Council of Elders	Mamadou Bailo Diallo	Council of Elders	Elder	
Daramagnaki	Madina Dian		Youth	Ibrahima Diallo	District Bureau	Assistant, Youth Representative	None
Daramagnaki	Madina Dian		Youth	Amadou Sara Diallo	District Bureau	Youth Representative	
Daramagnaki	Madina Dian		Police	Samba Diouma Diallo	District Bureau	Town Police	
Daramagnaki	Madina Dian		Police	Samba Diouma Diallo	District Bureau	Town Police	
Daramagnaki	Madina Dian		Police	Samba Diouma Diallo	District Bureau	Town Police	
Daramagnaki	Madina Dian	Bourreti	District Bureau	Boubacar Camara	Bureau du district	Staff	
Daramagnaki	Madina Dian	Bourreti	Religious	Thierno Mahmaoud Diallo	mosque	Imam	
Daramagnaki	Madina Dian	Missira	Administration	Amid Diallo	Commune	Treasurer	
Daramagnaki	Madina Dian	Missira	Agriculture and Fishing	Boubacar Hotia Diallo	-	Acting Veterinarian, Technical Husbandry Service	
Daramagnaki	Madina Dian	Missira	Village Chief	Ibrahima Diallo	Sector Bureau	Chief	
Daramagnaki	Madina Dian	Missira	Village Chief	Amadou Bailo Bah	Sector Bureau	Chief, also Secretary of Madina Dian District	
Daramagnaki	Madina Dian	Missira	Conseil	Bailo Cissé	Commune	Councillor	
Daramagnaki	Madina Dian	Missira	Mayor	Mamadou Bhoie Bah	Commune	Mayor (absent)	
Daramagnaki	Madina Dian	Missira	Unclassified	Alpha Talibe Diop	-	Secretary GPT	
Daramagnaki	Madina Dian	Missira	Unclassified	Moussa Diop	-	Secretary RPG	
Daramagnaki	Madina Dian	Missira	Subprefect	Alpha Oumar Diakite	Subprefecture	Subprefecture	
Daramagnaki	Madina Dian	Ndantari (Daramagnaki)	Youth	Alassane Camara	Youth Bureau	Youth Representative	
Daramagnaki	Madina Dian	Sitako	Youth	Amatamou Bah	Youth Bureau	Youth Representative	
Sangaredi	Balandougou		President, District Bureau	Boubacar Diallo	District Bureau	President	Low
Sangaredi	Balandougou	Djoloun	Village Chief	Boubacar Sall	-	Village Chief	None

Sangaredi	Balandougou	Lougal Centre	Sector Bureau	Amadou Saikou Bah	Sector Bureau	Assistant, Chief	None
Sangaredi	Balandougou	Lougal Centre	Education	Abdoul Karim Diallo	Elementary School	Teacher	None
Sangaredi	Balandougou	Lougal Centre	Youth	Alpha Oumar Bah	Sector Bureau	Youth Representative	None
Sangaredi	Boullere	Bandodji Nialby	Council of Elders	Mamadou Biko Camara	Council of Elders	Elder	None
Sangaredi	Boullere	Bandodji Nialby	Council of Elders	Mamadou Saliou Bah	Council of Elders	Elder	None
Sangaredi	Boullere	Bandodji Tougouye	Religious	Mamadou Dian Diallo	Mosque	Imam	None
Sangaredi	Boullere	Bossere	Chief de ménage	Younoussa Barry	-	Village Head of Household	Low
Sangaredi	Boullere	Bossere	Council of Elders	Kanfori Bangoura	Council of Elders	Elder	None
Sangaredi	Boullere	Bossere	Council of Elders	Mohamed Ali Camara	Council of Elders	Elder	None
Sangaredi	Boullere	Bossere	Council of Elders	Samba Keita	Council of Elders	Elder	None
Sangaredi	Boullere	Boullere Centre	District Bureau	Mamadou Lamine Bah	District Bureau	Staff	Low
Sangaredi	Boullere	Boullere Centre	District Bureau	Thierno Alhassane Bah	District Bureau	Vice President	Low
Sangaredi	Boullere	Boullere Centre	Sector Bureau	Mamadou Moktar Bah	District Bureau	Secretary	Low
Sangaredi	Boullere	Boullere Centre	Religious	El Hadh Abdouallaye Bah	Mosque	Senior Imam	Low
Sangaredi	Boullere	Boullere Centre	Religious	Mamadou Dian Diallo	Islamic League	District Representative	Low
Sangaredi	Boullere	Fassaly Belendere	Council of Elders	Mamadou Aliou Diallo	Council of Elders	Elder	Rumors
Sangaredi	Boullere	Fassaly Belendere	Council of Elders	Thierno Sidi Camara	Council of Elders	Elder	Rumors
Sangaredi	Kourawel	Kahel Mbody	Sector Bureau	Souleymane Hawa Diallo	Sector Bureau	Youth Director	
Sangaredi	Kourawel	Kahel Mbody	Village Chief	Mamadou Saliou Bah	Sector Bureau	Chief	
Sangaredi	Kourawel	Kahel Mbody	Council of Elders	Sadaba Diallo	Council of Elders	Elder	
Sangaredi	Kourawel	Kahel Mbody	Religious	Mamadou Alimou Diallo	Mosque	Second Imam	
Sangaredi	Kourawel	Kourawel Centre	District Bureau	Alpha Oumar Bah	District Bureau	Staff	Low, heard about plant to build new housing in Sangaredi

Sangaredi	Kourawel	Kourawel Centre	Council of Elders	Satoun Bah	Council of Elders	Elder	
Sangaredi	Kourawel	Nyale Boussoura	Youth	Souleymane Touré	Youth Office	Staff	
Sangaredi	Kourawel	Nyale Djaiman	Village Chief	Abdoulaye Toure	-	Village Chief	
Sangaredi	Kourawel	Nyale Hogo	Sector Bureau	Abdoulaye Diallo	Sector Bureau	Staff	
Sangaredi	Kourawel	Nyale Hogo	Village Chief	Mamadou Oury Diallo	Sector Bureau	Chief	
Sangaredi	Kourawel	Nyale Hogo	Council of Elders	Thierno Mamadou Bobo Diallo	Council of Elders	Elder	
Sangaredi	Kourawel	Nyale Misside	Village Chief	Manga Bossy	-	Village Chief	
Sangaredi	Kourawel	Nyale Misside	Youth	Mamadou Aliou Diallo	-	Youth Director	
Sangaredi	Kourawel	Nyale Moussa	Sector Director	Djakariaore Bah	Sector Bureau	Sector Director	
Sangaredi	Kourawel	Nyale Moussa	Council of Elders	Koulibaly Souleymane	Council of Elders	Elder	
Sangaredi	Kourawel	Parawol Aliou	Village Chief	Ibrahim Sory Diallo	Sector Bureau	Chief	Low
Sangaredi	Kourawel	Parawol Aliou	Council of Elders	Amadou Oury Diallo	Council of Elders	Elder	Low
Sangaredi	Kourawel	Sintiourou Boussoura	Village Chief	Lamarana Diallo	-	Village Chief	
Sangaredi	Lavage		Council of Elders	Ousmani Bah	Council of Elders	Staff	Low
Sangaredi	Lavage		Council of Elders	Samba Diallo	Council of Elders	Staff	Low
Sangaredi	Lavage		President, District Bureau	Satala Bah	District Bureau	President	Low
Sangaredi	Lavage	Ndantari	Sector Bureau	Thierno Bashir Barry	Sector Bureau	Secretary	Low
Sangaredi	Lavage	Ndantari	Conseil	Almamy Malik Diallo	Sector Bureau	Councillor	Low
Sangaredi	Lavage	Ndantari	Council of Elders	Yaya Barry	Council of Elders	Elder	Low
Sangaredi	Silidara	Cogon Lengue	Sector Bureau	Seikou Oumar Toure	Sector Bureau	Deputy Director	Medium (heard that reforested sectors were going to be mined again)
Sangaredi	Silidara	Doumoun Cogon	Village Chief	Yero Bah	-	Village Chief	
Sangaredi	Silidara	Dounsi	Village Chief	Ibrahim Bah	Sector Bureau	Chief	Low

Sangaredi	Silidara	Hore Sella (Hamlet 3)	Village Chief	Thierno Bashir	-	Village Chief	Low
Sangaredi	Silidara	Ndanta Fongne	Sector Bureau	Bassambatenen Bah	Sector Bureau	Deputy Director	Low
Sangaredi	Silidara	Passago	Village Chief	Saliou Tenen Bah	Bureau	Village Chief	Low
Sangaredi	Silidara	Sella Rounde	Village Chief	Mamadou Saliou Bah	-	Village Chief	Low
Sangaredi	Silidara	Sellawol	Village Chief	Yero Djouma	-	Village Chief	
Sangaredi	Silidara		District Bureau	El Hadji B Fofana	District Bureau	Vice President	Low
Sangaredi	Silidara		Sector Bureau	Boubacar Diallo	District Bureau	Secretary	Low
Sangaredi	Silidara		Sector Bureau	Amadou Ouri Bah	Sector Bureau	Secretary	Low
Sangaredi	Silidara		Sector Bureau	Amadou Ouri Bah	Sector Bureau	Secretary	Low
Sangaredi	Silidara		Sector Bureau	Amadou Ouri Bah	Sector Bureau	Director, Security	Low
Sangaredi	Silidara		Sector Bureau	Amadou Ouri Bah	Sector Bureau	Director, Security	Low
Sangaredi	Silidara		Sector Bureau	Mamadou Aliou Camara	Sector Bureau	Assistant Secretary	Low
Sangaredi	Silidara		Village Chief	Mamadou Diakité	Sector Bureau	Chief	Low
Sangaredi	Silidara		President, District Bureau	Mamadou Tela Bah	District Bureau	President	Low
Sangaredi	Souka		Police	Ibrahima Camara	District Bureau	City police	None
Sangaredi	Souka		President, District Bureau	Sherif Idrissa Camara	District Bureau	District president	None
Sangaredi	Souka		Religious	Thierno Moktar Bah	Mosque	Imam	None
Sangaredi	Souka		Healthcare	Mamadou Houdi Bah	Health Center	Healthcare Worker	None
Sangaredi	Souka	Feto Parawi	Village Chief	Fode Baïlo Diallo	Sector Bureau	Chief	
Sangaredi	Souka	Gnangaba	Sector Bureau	Mamadou Aliou Diallo	Sector Bureau	Staff	
Sangaredi	Souka	Gnangaba	Village Chief	Mamadou Foula Diallo	-	Chief	
Sangaredi	Souka	Gnangaba	Village Chief	Yero Djouma Diallo	Sector Bureau	Chief	
Sangaredi	Souka	Kalinko Guessore	Sector Director	Ibrahima Bah	Sector Bureau	Sector Director (Village Chief ?)	None
Sangaredi	Souka	Kalinko Poutai	Council of Elders	Thierno Lama Souka Bah	Council of Elders	Elder	
Sangaredi	Souka	Kankalare	Village Chief	Ibrahima Sory Sidibe	-	Chief	
Sangaredi	Souka	Parawi	Village Chief	Yakouba Keita	-	Chief	
Sangaredi	Souka	Parawi Saleah 1	Village Chief	Dian Sadjo Touré	-	Chief	
Sangaredi	Souka	Parawi Saleah 1	Village Chief	Samba Sidibe	Sector Bureau	Chief, All Parawi Saleah hamlets + Parawi	



Sangaredi	Souka	Sintiourou Barkere	Village Chief	Pété Camara	-	Chief	
Sangaredi	Souka	Teli Bofi	Village Chief	Lama Toure	Sector Bureau	Chief	
Sangaredi	Souka	Teli Bofi	Council of Elders	Negue Diallo	Council of Elders	Elder	
Sangaredi	Thiankounnaye	Hore Lafou	Religious	Idrissa Bah	Mosque	Third Imam	Low
Sangaredi	Thiankounnaye	Boundou Wandé	Sector Bureau	Algassimou Bah	Sector Bureau	Deputy Director	Low
Sangaredi	Thiankounnaye	Boundou Wandé	Education	Mamadou Aliou Bah	APAE (Association of Grade School Students and Supporters)	President	Low
Sangaredi	Thiankounnaye	Boundou Wandé	Education	Abdoulaye Diallo	APAE ( Grade School Students and Supporters )	Vice President	Low
Sangaredi	Thiankounnaye	Boundou Wandé	Youth	Mamadou Celiou Camara/ Diallo	Sector Bureau	Youth Representative	Low
Sangaredi	Thiankounnaye	Boundou Wandé	Religious	Mamadou Bhoy Diallo	Mosque	Senior Imam	Low
Sangaredi	Thiankounnaye	Boundou Wandé	Religious	Amadou Tidian Diallo	Mosque	Second Imam	Low
Sangaredi	Thiankounnaye	Boundou Wandé	Religious	Amadou Dioulde Bah	Mosque	Muezzin	Low
Sangaredi	Thiankounnaye	Hafia 1	District Bureau	Baïlo Sangui Bah	District Bureau	Vice President	Low
Sangaredi	Thiankounnaye	Hafia 1	Village Chief	Amadou Djoudjou Bah	Sector Bureau	Chief	Low
Sangaredi	Thiankounnaye	Ndiarinde Misside	Sector Bureau	Ibrahim Barry	Sector Bureau	Deputy Director	Low
Sangaredi	Thiankounnaye	Ndiarinde Misside	Youth	Abdoulaye Barry	Sector Bureau	Youth Representative	Low
Sangaredi	Thiankounnaye	Ndiarinde Rounde	Sector Bureau	Mamadou Pathe Diallo	Sector Bureau	Chief / Blacksmith	Low
Sangaredi	Thiankounnaye	Ndiarinde Rounde	Religious	Mamadiou Aliou Barry	Mosque	Muezzin	Low
Sangaredi	Thiankounnaye	Ndiarinde Rounde	Tradiitional Healer	Mane Aldjiouma	-	Karamoko/Healer	Low
Sangaredi	Wossou	Kalinko Ley	Village Chief	Mamadou Oudi Bah	Sector Bureau	Chief	
Sangaredi	Wossou	Kalinko Ley	Council of Elders	Thierno Mamadou Aliou	Council of Elders	Elder	

Sangaredi	Wossou	Kalinko Ley	Youth	Mamadou Moumini Bah	Sector Bureau	Assistant, Youth President	
Sangaredi	Wossou	Sintiourou madina (Wossou)	Village Chief	Moustapha Bah	-	Chief	
<b>ZONE 2</b>							
Kamsar	Kamakouloun	Katomou	Council of Elders	El Hadje Kouyate	Council of Elders	Elder	None
Kamsar	Kamakouloun	Katomou	Council of Elders	Malick Camara	Council of Elders	Elder	None
Kamsar	Kamakouloun	Madina Toumbeta	Sector Director	Hansouman Camara	Sector Bureau	Sector Director	None
Kamsar	Kamakouloun	Madina Toumbeta	Council of Elders	Bafodé Fofana	Council of Elders	Elder	None
Kamsar	Kamakouloun	Madina Toumbeta	Council of Elders	El Hadje Mamadou Dansogo	Council of Elders	Elder	None
Kamsar	Madina Borboff	Madina Bobof	Sector Director	Lamine Conté	Sector Bureau	Sector Director	None
Kolaboui	Diassia	Diendien Bourre	Sector Bureau	Alassane Keita	Sector Bureau	Assistant Director, Sector	None
Kolaboui	Diassia	Diendien Bourre	Council of Elders	Abdul Karim Camara	Council of Elders	Elder	None
Kolaboui	Diassia	Diendien Bourre	Council of Elders	Souleyman Barry	Council of Elders	Elder	None
Kolaboui	Diassia	Diendien Bourre	Council of Elders	Souleyman Keita	Council of Elders	Elder	None
Kolaboui	Diassia	Segueya Sini	Council of Elders	Sheikh Oumar Keïta	Council of Elders	Elder	None
Kolaboui			Economy	Siba Foster Koivogui	Town Hall	Local Development Officer	Rumor
Kolaboui			Town Hall	Ibrahima Camara	Town Hall	Secretary General	Radio
Kolaboui			Town Hall	Ousmane Sangui Sampou	Town Hall	Facilitator	Rumor
Kolaboui			Subprefecture	Malick Savané	Subprefecture	Assistant Subprefecture	Rumor
Kolaboui	Kolaboui	Kondeyire	Youth	Alphonse Dopavogui	Youth Office	Youth Representative	None

Sangaredi			CR	Laye Nouhan Kaba	CR	Secretary General	Low
Sangaredi			Mayor	Ibrahima Barry	CR	Mayor	Low
Sangaredi			Town Hall	Moly Moussa Bangoura	Town Hall	Director, Technical Division	Rumor
Sangaredi			Prefecture	Pascal Dembadouno	Prefecture	General in Charge of the Mining Communities	Average
Sangaredi			Préfet	El Hadj Daouda Bangoura	Prefecture	Préfet	Low
Sangaredi	Boulléré	Filo Bowal	Village Chief	Alpha Oumar Diallo	-	Chief	None
Sangaredi	Boulléré	Filo Bowal	Religious	Mamadou Bobo Diallo	Mosque	Imam	None
Sangaredi	Thiankou Naï	Sintiourou Hafia	Village Chief	Amadou Tidiane	-	Chief	
Sangaredi	Thiankou Naï	Sintiourou Hafia	Village Chief	Mamadou Ouri Diallo	Sector Bureau	Chief	Medium (Rumours among friends of CBG workers that number of trucks will increase)
Tanéné			District Bureau	Babagalé Kaltamba	District Bureau	Vice President	None
Tanéné			CR	M Diallo	CR	Secretary General	None
Tanéné			Education	Ibrahima Mané	Subprefecture	Director of Education	None
Tanéné			Mayor	Youssouf Ndiaye	CR	Mayor	None
Tanéné			Mayor	Youssouf Ndiaye	CR	Mayor	None
Tanéné			Mayor	Youssouf Ndiaye	Town Hall	Mayor	None
Tanéné			Mayor	Youssouf Ndiaye	Town Hall	Mayor	None
Tanéné			President, District Bureau	Aboubacar Sané	District Bureau	President	None
Tanéné			Subprefecture	M Sampo	Subprefecture	Assistant Subprefecture	None
Tanéné	Dambantian	Belli Thindi	Sector Director	Abdoul Karim Diallo	Sector Bureau	Sector Director	None
Tanéné	Dambantian	Tinguinlinta	Sector Director	Sadiouma Diallo	Sector Bureau	Sector Director	None
<b>ZONE 3</b>							
Kamsar			Administration	Robert Ibaro Bangoura	Town Hall	Town Receiver	Low
Kamsar			Agriculture and Fishing	Mory Laye Foté Soumah	Regional Coordination of Boké's Traditional Fishers	Regional Coordinator	Less (TV speech by Guinea's president)

Kamsar			Agriculture and Fishing	Mamadou Camara	Prefectural Department of Fisheries	Director	Less (TV speech by Guinea's president)
Kamsar			Agriculture and Fishing	Jean Faustin Camara	Prefectural Department of Fisheries	Deputy Director	Less (TV speech by Guinea's president)
Kamsar			Civil Society Bureau	Lama Sidiki Doumbouya	Civil Society Bureau	President	Less (TV speech by Guinea's president)
Kamsar			Civil Society Bureau	M'Mah Bangoura	Civil Society Bureau	Vice President	
Kamsar			Village Chief	Fodé Berete Camara	Port of Kamsar	Chief	
Kamsar			Sector Director	Idrissa Camara	Town Hall	Sector Director Kamsar II	Low
Kamsar			CR	Mamadouba Sogueta Camara	Kamsar Town Government	Secretary General	Less (TV speech by Guinea's president)
Kamsar			Conseil	Djibril Tresor Bangoura	Town Hall	Town Councillor	Low
Kamsar			Conseil	Younoussa Doune Camara	Town Hall	Town Councillor	Low
Kamsar			Economy	Yousseuf Bangoura	Chamber of Commerce	Assistant, Disputes and Social Affairs	
Kamsar			Economy	Amadou Sissoko	Chamber of Commerce	Official, Disputes and Social Affairs	Less (TV speech by Guinea's president)
Kamsar			Economy	El Hadj Boubacar Dara Baldé	Chamber of Commerce	President	
Kamsar			Economy	Facinet Camara	Subprefectural Department of Trade and Small Business	Director	Less (Speech by CBG's CEO)
Kamsar			Economy	Asma Diaby	SOCANE	Bureau Staff	
Kamsar			Economy	Seidouba Keita	SOCANE	Bureau Staff	
Kamsar			Economy	Lamine Soumah	SOCOREM	Bureau Staff	
Kamsar			Economy	Mariam Diallo	SOCOREM	Bureau Staff	
Kamsar			Economy	Sory Sano	SOCOREM	Bureau Staff	
Kamsar			Economy	Kadiatou Sow	SONECI	Secretary	
Kamsar			Economy	Mariam Barry Camara	SOCANE Microbusiness	Bureau Staff	
Kamsar			Economy	Abdulaye Sané	SOCOREM Microbusiness	Director, HR	

Kamsar			Economy	Koumbassa Sanoussy	SONECI Microbusiness (Industrail Dredging and Cleaning)	Director, HR	Less (Speech by CBG's CEO)
Kamsar			Economy	James Dean Mansaré	SONECI	President	
Kamsar			Economy	Facinet Laysane Camara	Subprefecture	Chief de bureau PME	High
Kamsar			Economy	Ahmed Yomba Tore	SONECI	Accountant	
Kamsar			Education	Salif Bangoura	Delegation of High School Teachers	Second Public Records Keeper	
Kamsar			Education	M'Balou Traoré	Delegation of High School Teachers	Public Records Keeper	Less (Speech by CBG's CEO)
Kamsar			Education	Yaya Camara	Delegation of High School Teachers	Delegate	
Kamsar			Education	Youssouf Diallo	Delegation of High School Teachers	Assistant Delegate	
Kamsar			Education	Tidjane Soumah	Delegation of High School Teachers	Secretary	
Kamsar			Women	Oumou Coya Camara	Sahara Women's Market Association of Kamsar	Chair	
Kamsar			Women	Gnama Condé	Women Teachers' Socio-Educational Development Association	Chair	Less (Speech by CBG's CEO)
Kamsar			Mayor	El Hadje Tidjane Sylla	Town Hall	Mayor	Low
Kamsar			NGO	Mamadou Bangoura	AIGLES NGO	Coordinator	Less (Speech by CBG's CEO)
Kamsar			NGO	Aly Dembo Camara	AIGLES NGO	Administrative Secretary	
Kamsar			NGO	Mamadou Barry	AIGLES NGO	Director, Training	
Kamsar			Port	Aboubacar Camara	Port of Kamsar	Vice President	Less (TV speech by Guinea's president)
Kamsar			Subprefecture	Namori Keita	Subprefecture	Intern, Quality Control	

Kamsar			Subprefecture	Keoulen Kourouma	Subprefecture	Director, Quality Control	Low (Rumors)
Kamsar			Subprefect	Kourouma Samah Kaba	Subprefecture	Subprefecture	Average

APPENDIX 7: CONSULTATION DATA INPUT FORM



CBG—Social Data Input Form

Activity <sup>*13</sup> : Impact Study Consultation		
Place*:	Date*:	Time*:
Facilitator*:		Writer*:

1—Participants  
Approximate number: 1

Types:

Representative	Organization	Title	Tel. #

<sup>13</sup> An asterisk (\*) means the information is to be supplied.

**2 —Discussion**

Content*	Participant



**3 —Follow-up by CBG**

<i>Please identify the follow-up measures agreed during the consultation process (additional information to be provided after the meeting, dates of future consultation activities, etc.), along with the name of the requesting stakeholder.</i>	
Stakeholder	Follow-up





APPENDIX 8: RISK ANALYSIS MATRIX

Health/Safety/Environmnt/Social Risk Analysis Matrix					Probability				
Gravity	Consequence on				(A) Very probable	(B) Improbable	(C) Possible	(D) Probable	(E) Quasi certain
	Health/Safety	Material Damage	Environment	Social	1/100 years or pratically impossible	1/10 years or already happened in industry	1/year or has happened in the same industry sector	1/month or not suprising	1/week inevitable
1	Aid	Insignifiant (< \$10,000)	Leak below levels 2, 3, 4 or 5 thresholds	Local impact	Weak	Weak	Weak	Moderate	Significant
2	Medical treatment	Minor (< \$100,000)	LOPC > 500 kg	Provincial impact	Weak	Weak	Moderate	Significant	High
3	Temporary assignment	Moderate (< \$1,000,000)	Leak the constitute a threat to public's health & safety	Formal administrative notice	Weak	Moderate	Significant	High	Extreme
4	Accident with shutdown	Major (< \$10,000,000)	Leak causes evacuation of third party facilities	National impact	Moderate	Significant	High	Extreme	Extreme
5	Fatality	Catastrophic (> \$10,000,000)	Leak causes a persistant damage to the environment	International Impact	Significant	High	Extreme	Extreme	Extreme

	<b>HSEC MANAGEMENT PROGRAM</b>	Document No.: CBG_HSEC_PRO_5040 Version: 1 Issue Date: 18/09/2015 Review Date: 17/09/2018
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# PROCEDURE FORSTAKEHOLDER ENGAGEMENT MANAGEMENT PLAN

### DOCUMENT APPROVAL

POSITION	NAME	SIGNATURE	APPROVAL DATE
Originator	Mohamed Talhaoui		18/09/2015
Manager / Verification	Ablo Abdoulaye Diallo		18-9-15
General Manager	Namory Condé		18-09-15
Document Owner	Mohamed Talhaoui		18/09/2015

### AMENDMENTS

ISSUE	PAGE	DATE	DETAILS OF AMENDMENT	MAJOR / MINOR

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Document No.:	CBG_HSEC_PRO_5040
Version:	1
Issue Date:	18/09/2015
Review Date:	17/09/2018

### TABLE OF CONTENTS

1	OBJECTIF.....	3
2	PROCEDURE.....	3
2.1	Les intérêts .....	3
2.2	Principes du plan de relations communautaires.....	4
2.3	Analyse des parties prenantes .....	4
2.4	Plan d'engagement.....	6
2.5	Documentation du processus .....	7
2.6	L'équipe des relations communautaires .....	7
2.7	Evaluation du PEPP .....	7
3	REFERENCE.....	8
4	ENREGISTREMENTS .....	8


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	<b>HSEC MANAGEMENT PROGRAM</b>	Document No.: CBG_HSEC_PRO_5040 Version: 1 Issue Date: 18/09/2015 Review Date: 17/09/2018
--	--------------------------------	--

## 1 OBJECTIF

Le but à long terme de cette procédure d'implantation du plan d'engagement des parties prenantes (PEPP) est de permettre la mise en œuvre des projets de la CBG de façon à ce que les normes pertinentes de développement durable de la Société Financière Internationale (SFI) et les meilleures pratiques selon le domaine soient respectées, et les parties intéressées (PP) soutiennent les projets et opérations de la Compagnie des Bauxites de Guinée.

## 2 PROCEDURE

### 2.1 Les intérêts

Les objectifs de cette procédure sont de:

- Assurer les échanges transparents, honnêtes et à deux sens d'opinion et d'informations sur les projets et opérations de la CBG et les parties prenantes locales;
- Sensibiliser les communautés sur les dangers et impacts des travaux d'exploration et des projets en cours ;
- Construire une bonne relation à long terme entre les PP et la CBG ;
- Faciliter et améliorer les négociations entre la CBG et les autres PP ;
- Identifier en permanence les nouvelles questions, attentes et éventuelles contraintes qui pourraient être soulevées par les PP ;
- Assurer le suivi et l'évaluation régulière des impacts du projet, et des activités de la CBG en général afin d'accroître son impact lorsqu'il est positif ou d'en atténuer ses effets lorsqu'ils sont négatifs ou perçus comme tels ;
- Améliorer le cadrage des actions sociales menées par la CBG ou sur des fonds issus de CBG (qu'ils soient des fonds propres ou les fonds des taxes dues) ;
- Favoriser au maximum les retombées positives locales notamment en termes d'emploi et de prestations/ventes ;
- Permettre une communication multilatérale entre les PP et assurer une diffusion de l'information la plus large et la plus transparente possible.

Cette procédure établit comment les flux de communication entre le personnel des projets et d'opérations de la CBG, ses consultants techniques et les populations locales d'autre part, seront facilités, documentés et évalués.

Tout en reconnaissant que les sujets évolueront selon les besoins, les informations échangées initialement concerneront :

- La communication des activités programmées des projets et opérations de la CBG ;
- La communication des politiques de QSE de CBG et des orientations en termes de Relations Communautaires ;
- L'Identification/enregistrement des questions, attentes et plaintes des personnes concernées par les opérations et les projets de la CBG ;
- Les réponses aux plaintes des personnes affectées ;
- L'exploitation de l'expertise, des ressources et des connaissances locales dans la conception des projets, des études environnementales et socio-économiques et des procédures de la société.


Les communications ci-dessus devront:

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--	--------------------------------	--

- Améliorer la compréhension mutuelle entre les opérations et les projets de la CBG et les communautés locales ;
- Identifier les impacts non anticipés des projets ;
- Alerter des possibles ruptures dans la communication, des problèmes émergeants et des soucis entre la société et les communautés locales ;
- Encourager l'utilisation des ressources locales.

## 2.2 Principes du plan de relations communautaires

La politique de QSE et la vision de la CBG exigent à ce que la CBG communique régulièrement, ouvertement et honnêtement avec les personnes affectées par nos opérations, et prenons leurs commentaires et préoccupations en compte lors de nos prises de décisions.

Sur la base de cette politique QSE ainsi que des principes de la Société Financière Internationale (SFI), les principes suivants constituent la base de cette procédure:

- Participation : la participation de toutes les parties prenantes locales dans les échanges doit être assurée. Le Responsable du PEPP doit rester attentif à l'émergence ou la formation de nouveaux groupes intéressés pendant toute la durée des opérations et des projets. Bien que des différences de pouvoir existent entre les parties intéressées, CBG devra s'efforcer de s'assurer que les voix des plus faibles soient entendues.
- Transparence et confiance : Le PEPP doit être fondé sur une relation de confiance et de respect entre les parties prenantes. Cela se traduit par une approche transparente et ouverte aux différentes valeurs culturelles et bases de connaissance.
- Cohérence : Les échanges sur différents aspects des projets (activités, recrutement et emploi, développement communautaire) doivent être coordonnés de manière cohérente, suivie et efficace afin d'éviter la contradiction, la confusion, la duplication et les réunions trop nombreuses.
- Sensibilité culturelle et communication appropriée : Les informations doivent être communiquées dans une forme appropriée à chaque partie prenante et en tenant compte de la sensibilité culturelle de chaque groupe à laquelle elles s'adressent.
- Flexibilité : La planification des activités du PEPP doit être flexible pour permettre de répondre de façon appropriée et diligente aux changements des besoins et des circonstances.
- Evaluation continue : L'efficacité du PEPP doit être évaluée de façon régulière et le processus peut nécessiter d'être ajusté en conséquence.

## 2.3 Analyse des parties prenantes

L'analyse détaillée des parties prenantes est la fondation d'un plan d'engagement des parties prenantes (PEPP) efficace. Les parties prenantes se définissent comme les groupes ou individus qui « seront directement ou indirectement affectés, positivement ou négativement, par le Projet et qui peuvent contribuer à ou limiter son succès. » Par nature, l'identification des parties prenantes est un processus continu et itératif; davantage de parties prenantes sont typiquement identifiées pendant que le projet se poursuit. Alors que les communautés locales peuvent sembler assez homogènes au départ, les interactions avec les projets révèlent souvent l'existence de sous groupes avec des besoins relationnels et de communication différents.

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--	--------------------------------	--

L'analyse des parties prenantes a été réalisée dans le cadre du PEPP préparé pour l'Étude d'impacts environnemental et social du Projet d'extension. La liste des parties prenantes présentée dans ce document sera régulièrement mise à jour selon la procédure « *Procedure for stakeholder identification and mapping* ».

Tableau 2-1: Liste des parties prenantes selon les enjeux principaux.

Enjeux	Parties prenantes potentiellement ciblées par les consultations <sup>1</sup>
Communication	<ul style="list-style-type: none"> <li>• Toutes les PPP</li> </ul>
Emploi	<ul style="list-style-type: none"> <li>• Entreprises sous-traitantes</li> <li>• Syndicats</li> <li>• Sages des localités concernées</li> <li>• Jeunesse locale</li> <li>• Femmes</li> </ul>
Développement économique	<ul style="list-style-type: none"> <li>• Préfecture(s) de référence</li> <li>• Commune(s) Rurale(s) de référence</li> <li>• Sous-préfecture(s) de référence</li> <li>• Sages des localités concernées</li> <li>• Entrepreneurs locaux</li> <li>• ONG</li> <li>• Groupes d'intérêt locaux (femmes, jeunes, groupements, etc.)</li> <li>• Société civile</li> </ul>
Infrastructures	<ul style="list-style-type: none"> <li>• Préfecture(s) de référence (services techniques)</li> <li>• Sous-préfecture(s) de référence (services techniques)</li> <li>• Commune(s) Rurale et urbaine(s) de référence</li> <li>• Société civile</li> <li>• Districts</li> </ul>
Foncier/occupation du sol	<ul style="list-style-type: none"> <li>• Commune(s) de référence</li> <li>• Sages des localités concernées</li> <li>• Aînés des lignages</li> <li>• Propriétaires et occupants du sol</li> <li>• Société civile</li> </ul>
Relocalisation	<ul style="list-style-type: none"> <li>• Préfecture(s) de référence</li> <li>• Commune(s) Rurale(s) de référence</li> <li>• Sous-préfecture(s) de référence</li> <li>• Sages des localités concernées</li> <li>• Districts</li> <li>• Société civile</li> </ul>
Migrations	<ul style="list-style-type: none"> <li>• Préfecture(s) de référence</li> <li>• Commune(s) Rurale(s) de référence</li> <li>• Sous-préfectures</li> <li>• Sages des localités concernées</li> <li>• Districts</li> </ul>
Risques sanitaires	<ul style="list-style-type: none"> <li>• Préfecture(s) de référence</li> <li>• Commune(s) Rurale(s) de référence</li> <li>• Sous-préfecture(s) de référence</li> <li>• Sages des localités concernées</li> <li>• Districts</li> <li>• Groupes d'intérêt locaux (femmes, jeunes)</li> </ul>
Trafic routier	<ul style="list-style-type: none"> <li>• Préfecture(s) de référence</li> </ul>


<sup>1</sup> NB - Pour les services publics déconcentrés et décentralisés, il s'agit de contacter le responsable thématique au sein de chaque institution, s'il existe.

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--	--------------------------------	--

Enjeux	Parties prenantes potentiellement ciblées par les consultations <sup>1</sup>
	<ul style="list-style-type: none"> <li>Commune(s) Rurale(s) de référence</li> <li>Sous-préfecture(s) de référence</li> </ul>
Dégradation de l'environnement (notamment en zone 1) : <ul style="list-style-type: none"> <li>Perte de terres</li> <li>Diminution des pâturages</li> <li>Pollution des eaux</li> <li>Dynamitage</li> </ul>	<ul style="list-style-type: none"> <li>Commune(s) Rurale(s) de référence</li> <li>Sous-préfecture(s) de référence</li> <li>Sages des localités concernées</li> <li>Districts</li> <li>Groupes d'intérêt locaux (femmes, jeunes, groupements d'intérêt économique, etc.)</li> </ul>

## 2.4 Plan d'engagement

Il suit un résumé du processus et des mécanismes à utiliser pour réaliser les buts du PEPP et satisfaire les demandes des PP. Il est à noter que les consultations en lien avec la réinstallation et la restauration des moyens de subsistance ne sont pas traitées dans ce document. Le processus de consultation pour des Plans d'action de réinstallation et compensation est présenté dans le document « *Resettlement and livelihoods restoration policy framework* ».

Tableau 2-2: Liste des mécanismes à utiliser pour réaliser les buts du PEPP.

Mécanisme	Audience ciblée	Objectif(s)	Calendrier	Support	Notes
Réunions générales ouvertes	Tous les résidents d'une communauté donnée affectée par les travaux de la CBG	Transmettre aux résidents les mises à jour, rassembler leurs commentaires et préoccupations, y répondre dans la mesure du possible.	Annuel et selon les besoins avant chaque activité majeure	Posters & Procédure plainte et compensation  Carte du Permis et des zones visées pour travaux  Posters processus campagne d'exploration et d'exploitation	Des démonstrations pratiques pourront faciliter la compréhension, et devront être en français et dans les langues locales
Réunions annuelles	Préfectures, sous préfectures et CRD situés dans le permis	Les mettre à jour sur les activités des projets et des opérations de la CBG et les questions de PEPP; rassembler et répondre aux commentaires, suggestions, demandes et préoccupations	Annuel	Politique QSE  Code sur la conduite des affaires  Posters & Procédure plainte et compensation  Cartes avec les zones visées pour travaux ou des études E&C	Le niveau de discussion sera plus approfondi que lors des réunions générales ouvertes
Consultations périodiques	Groupe cible selon les besoins	Adresser et résoudre les préoccupations, accéder aux connaissances et à l'expertise locale,	Selon les besoins ponctuelles.	Politique QSE Code sur la conduite des affaires Posters & Procédure plainte et	

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	<b>HSEC MANAGEMENT PROGRAM</b>	Document No.: CBG_HSEC_PRO_5040 Version: 1 Issue Date: 18/09/2015 Review Date: 17/09/2018
--	--------------------------------	--

		mises à jour sur les questions relatives aux projets et opérations		compensation Carte avec les zones visées pour travaux ou des études E&C	
Courrier ou verbal par les Coordinateurs E&C	Tous les résidents locaux	Pour transmettre les messages à des endroits publics centraux; pour réunir les plaintes (toutes les mois) et pour ramasser toute autre communication (candidatures, etc.) Les agents E&C sous couvert du coordonnateur E&C traiteront les plaintes reçues.	Mise à jour selon les besoins.	Procédure de plaintes et compensation	Endroits sont à prévoir et à confirmer localement
Radio CBG	Tous les résidents locaux	Pour diffuser largement les messages presque en temps réel	Selon les besoins (comme par exemple pour annoncer des réunions)	Communiqué	Large zone de couverture de Kamsar à Sangaredi
Presse	Tous les résidents locaux	Pour transmettre des nouvelles et des informations sur le Projet à un large public	Selon les besoins	Communiqué	Rarement utilisée ,compte tenu du taux élevé d'analphabétisme. À évaluer

## 2.5 Documentation du processus

Le Directeur HSEC documentera le processus de mise en œuvre du PEPP. Cela impliquera de :

- préparer des procès-verbaux pour chaque activité de consultation communautaire ;
- valider les procès verbaux avec les populations ciblées ;
- gérer un registre des engagements aux populations ;
- gérer un registre des plaintes ;
- maintenir un système d'enregistrement afin de conserver des traces des activités de relations communautaires entreprises avec les différentes parties prenantes ; et
- d'analyser sur une base régulière (au moins annuelle) les procès verbaux, plaintes et engagements aux populations afin de mettre à jour la cartographie des parties prenantes et le plan d'engagement des parties prenantes.

## 2.6 L'équipe des relations communautaires

L'équipe de relations communautaires est décrite dans l'organigramme HSEC régulièrement mise à jour et à défaut annuellement.

## 2.7 Evaluation du PEPP

L'efficacité du PEPP sera suivie tout le long du processus. Plusieurs indicateurs seront utilisés :

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Document No.:	CBG_HSEC_PRO_5040
Version:	1
Issue Date:	18/09/2015
Review Date:	17/09/2018

- Niveau de compréhension des opérations et des projets par les parties prenantes ;
- Attitude vis-à-vis des opérations et des projets parmi les parties prenantes ;
- Niveau d'implication des personnes affectées (utilisation des connaissances et de l'expertise locale) ;
- Niveau de sévérité des impacts sociaux et environnementaux ressenties par les personnes affectées (évaluation des dommages).

Le Directeur HSEC développera ces indicateurs et il sera en charge de suivre les progrès.

Le flux de communication entre les différentes parties prenantes et l'efficacité du PEPP seront suivis au moins une fois par an en utilisant les indicateurs établis.

Pour mesurer ces indicateurs, les sources suivantes seront utilisées :

- Nombre de plaintes reçues et le temps de résolution des plaintes ;
- Procès-verbaux des réunions ;
- Retour d'information informel des groupes de parties prenantes et données transcrites dans le processus de suivi-évaluation social ;
- Implication formelle et informelle des parties prenantes dans les projets ;
- Intégration et réalisation des demandes des parties prenantes dans le PGES.

### 3 REFERENCE

- *Norme de performance 1, Évaluation et gestion des risques et des impacts environnementaux et sociaux*, Normes de performance en matière de durabilité environnementale et sociale, Société Financière Internationale (2012).
- *Étude d'Impact Environnementale et Sociale*, ÉEM et Bureau Guinéen d'Études et d'Évaluation Environnementale (2014).

### 4 ENREGISTREMENTS

Document Number	Description	Archive Period
CBG_HSEC_PRO_5030	Stakeholder Identification and Analysis and Mapping	
CBG_HSEC_PRO_5060	Mécanisme de gestion des plaintes	
CBG_HSEC_ENR_5041	Procès-verbaux des réunions	

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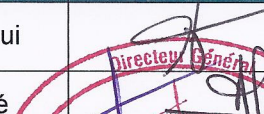

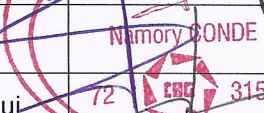
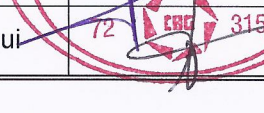


## HSEC MANAGEMENT PROGRAM

Document No.: CBG\_HSEC\_PRO\_5030  
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# PROCEDURE FOR STAKEHOLDER IDENTIFICATION, ANALYSIS & MAPPING

## DOCUMENT APPROVAL

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	<b>HSEC MANAGEMENT PROGRAM</b>	Document No.: CBG_HSEC_PRO_5030 Version: 1 Issue Date: 18/09/2015 Review Date: 17/08/2018
--	--------------------------------	--

## TABLE OF CONTENTS

1	Purpose .....	3
2	Rationale .....	3
3	Scope.....	3
4	Definitions .....	3
5	Procedure .....	3
5.1	Stakeholder identification and analysis .....	3
5.2	Stakeholder Mapping .....	6
6	Related documents .....	7
7	Records .....	7


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	<b>HSEC MANAGEMENT PROGRAM</b>	Document No.: CBG_HSEC_PRO_5030 Version: 1 Issue Date: 18/09/2015 Review Date: 17/08/2018
--	--------------------------------	--

## 1 Purpose

To ensure identification of all stakeholders relevant to the scope of the Stakeholder Engagement Management Plan in order to adequately address community relations issues.

To define minimum requirements for the identification of people and groups (stakeholders) who have an interest in CBG activities relative to their needs and interests, relative power and legitimacy, and relationships between them which can serve as a guide to the development of effective engagement mechanisms and strategies.

## 2 Rationale

A thorough understanding of a site's stakeholders provides the basis for effective engagement, and is the starting point for understanding points of access, support, negative perceptions of the site, and areas of conflict. A thorough and regularly updated stakeholder map will inform:

- Engagement and communications planning;
- Impact assessments;
- Conflict management processes;
- Community investment plans.

## 3 Scope

This procedure is applicable to CBG operations and properties at all phases of the mine life cycle, including exploration, design, construction, operation and closure.

## 4 Definitions

Stakeholders are those people or organizations that have an impact on, or are impacted by, the company. Stakeholders also include those people who have an interest, not necessarily financial, in the company.

## 5 Procedure

### 5.1 Stakeholder identification and analysis

#### **Stakeholder identification an analysis in:**

- Identifying stakeholders interest in, importance to, and influence over an operation
- Identifying institutions and processes that may be relevant to an operation.
- Providing a foundation and strategy for participation.

Stakeholder identification and analysis is a vital tool for understanding the social, economic, cultural, political and organizational context of an operation. Its findings can provide essential information about:

- Who will be affected by the operation (positively or negatively)
- Who could influence the project (positively or negatively)
- Which individuals, groups or agencies need to be :

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	<b>HSEC MANAGEMENT PROGRAM</b>	Document No.: CBG_HSEC_PRO_5030 Version: 1 Issue Date: 18/09/2015 Review Date: 17/08/2018
--	--------------------------------	--

- ✓ Involved in the operation;
- ✓ Consulted regarding the operation; and
- ✓ Involved in decisions regarding aspects of the operation.

Such information, if not known through direct interaction with the stakeholders, will be gathered, as appropriate, from relevant and credible sources.

### **Groups categorized as CBG stakeholders**

Stakeholders typically include people within the following categories:

- Employees
- Shareholders
- Communities (local, regional national, and international)
- Neighbours
- Customers
- Suppliers
- Contractors
- Media
- Government and regulatory authorities
- Non-government organizations
- Special interest groups
- Other businesses and associations

Each operation should formulate a stakeholder database and prioritise stakeholders according to the local context.

### **CBG commitment regarding stakeholder identification**

The HSEC Management Standards require that operations develop and implement a process for stakeholder identification and documentation.

A stakeholder register is the preferred method for record keeping. Stakeholder register should be functional to allow information to be assembled or collated by various categories.

### **Typical steps involved in stakeholder analysis and identification**

There are typically four steps involved in stakeholder analysis and identification.

#### **Step 1: Identify key stakeholders**

Assess:

- Who might be potential stakeholders
- Who might be adversely impacted
- Who might be positively impacted
- Whether potentially vulnerable or marginalised groups (eg. indigenous peoples, ethnic minorities, women, children etc.) have been identified
- Whether supporters of the operation been identified


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	<b>HSEC MANAGEMENT PROGRAM</b>	Document No.: CBG_HSEC_PRO_5030 Version: 1 Issue Date: 18/09/2015 Review Date: 17/08/2018
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- What relationships exist among the stakeholders (ie. ask stakeholders whether there is anyone else that may consider themselves a stakeholder).

**Step 2:** Assess stakeholder interests via consultation processes and determine the potential impact of the operation on these interests

Assess:

- What are the stakeholder's expectations of the project
- What benefits/impacts are likely for stakeholders
- Whether stakeholder interests will conflict with project goals

**Step 3:** Assess stakeholder influence and importance

For each stakeholder group assess its:

- Influence and status (political, social, economic)
- Degree of organisation
- Control of strategic resources
- Informal influence
- Power relations with other stakeholders
- Other relevant background

**Step 4:** Outline stakeholder participation and consultation strategy

Plan stakeholder involvement according to:

- Interests, importance and influence of each stakeholder group
- Particular efforts needed to involve important stakeholders who lack influence to ensure that all community concerns are considered.
- Appropriate forms of participation throughout the project cycle

### **Responsible for stakeholder analysis and identification**

Stakeholder identification should be undertaken via a collaborative brainstorming session. This will involve establishing a cross-functional team of people from around the Company with previous experience with the asset/country/operation. This cross-functional team should include external stakeholders and/or facilitators at various stages of the process.

Stakeholder analysis is not only a desk study, although reference to other documents and available information should be used where available and reliable. Analysis should also incorporate participatory methods where possible, during:

- Stakeholder workshops
- Local consultations and analysis
- Community interactions

### **Information should be captured for each stakeholder**

- Description of the stakeholder
- Primary point of contact if the stakeholder is a group or organisation
- Nature of CBG's current and previous involvement with the stakeholder
- Rationale behind why we are, or should be, involved with the stakeholder
- Level of contact with the stakeholder
- CBG representative/s who interact with the stakeholder


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- Reference to any published or specially commissioned reports relevant to the stakeholder of the issues involving the stakeholder.

### **Stakeholder register be updated**

Stakeholder register should be a dynamic tool for the process of community relations. They should be revised and adjusted throughout the lifecycle of the project and as strategies are implemented and evaluated.

Depending on the needs of the operation, stakeholder register may also be linked with a geographic information system (GIS) to 'map' communities and stakeholder groups.

An appropriate review period should be determined and align with the review period of the Community Relation Plan.

## **5.2 Stakeholder Mapping**

Stakeholders that may affect, or be affected by, CBG's site activities shall be identified. For each stakeholder or stakeholder group, identification shall include:

- Whether the stakeholder is directly or indirectly impacted by the site activity;
- Whether the stakeholder is impacted negatively or positively by the site activity;
- Whether the stakeholder supports, is neutral, or is opposed to the site activity;
- Each stakeholder's key interests and concerns in relation to the site activity;
- Their power/influence, legitimacy, and urgency in relation to the site.

Relationships between stakeholders shall be identified and assessed as to their strength and points of influence, as well as identifying areas of existing commonality or conflict.

Relationships between stakeholders shall be identified and assessed as to their strength and points of influence, as well as identifying areas of existing commonality or conflict.

A conflict assessment shall be undertaken prior to or as soon as reasonably practical after entering a site area (see Supporting Documents).

The conflict assessment shall comprise the following key components:

- Identification of existing issues or areas of conflict between stakeholder groups.
- Identification of issues or potential areas of conflict that the site activity may create or exacerbate.
- Identification of power relationships between stakeholders
- Mapping of site activities and personnel who will be interacting with stakeholders at those points of conflict.
- Recommended mitigation activities that may be undertaken to prevent (where possible) or minimize conflict due to CBG's presence must be incorporated into a site's stakeholder engagement plan (See External Stakeholder Engagement Standard)

The conflict assessment shall be reviewed and updated on a bi-annual basis.

The exercise of identifying stakeholders shall ensure that marginalized or vulnerable groups are identified.

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The outcomes above shall be validated through direct interaction with the relevant stakeholders, where possible.

This information, or “map,” shall be documented in an electronic and accessible format and reviewed/updated at least annually, and prior to and after any significant change in site activity or incident.

In order to respect the sensitivity of the information contained within the map, access shall be restricted to only authorized individuals. Sites shall develop appropriate procedures for the sharing of the information during relevant planning processes.

## 6 Related documents

- CBG\_HSEC\_PRO\_5020\_Stakeholder Engagement Management Plan
- ESIA - Chapter 6 – EEM - Consultation des parties prenantes - Déc. 2015
- ESIA – Stakeholder Engagement Management Plan– Nov. 2013
- The Stakeholder Engagement Manual, Vol. 2: The Practitioner’s Handbook. AccountAbility and UNEP, 2005.
- Conflict-Sensitive Business Practice: Guidance for Extractive Industries, International Alert, March 2005

## 7 Records

Document Number	Description	Archive Period
CBG_HSEC_ENR_5031	Stakeholder Identification and Analysis Register	
CBG_HSEC_ENR_5032	Stakeholder Mapping tool	
CBG_HSEC_PRO_5040	Stakeholder Engagement Management Plan	

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# Stakeholder Identification and Analysis Register

Table need to be updated and add the colons below:

Names of Key Representatives	Contact Details of the Key Representatives	Person with Single-point Accountability for Engaging the Stakeholder	Stakeholder Engagement Plan
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STAKEHOLDER ORGANISATION	IMPACT ON STAKEHOLDER INTEREST BY STAKEHOLDER	POTENTIAL INFLUENCE OF STAKEHOLDER ON THE PROJECT	LEVEL OF INFLUENCE EXTREME=E HIGH=H, MEDIUM=M, LOW=L
<ul style="list-style-type: none"> <li>Intl. Multilateral Organisations</li> <li>International and National Environmental NGOs</li> </ul>	<ul style="list-style-type: none"> <li>Opportunity for developing programmes</li> <li>Negative impact on their mission /vision</li> <li>Undermining of international norms and standards</li> </ul>	<ul style="list-style-type: none"> <li>Give Support</li> <li>Protest against</li> <li>Give publicity (negative- positive) and raise profile of the project in the international media</li> <li>Provide Expertise</li> </ul>	H
<b>IUCN</b> (Switzerland) <b>United Nations Educational, Scientific and Cultural Organisation</b>	<ul style="list-style-type: none"> <li>IUCN is cautious re. mining</li> <li>Objective is to reconcile human activity with nature.</li> </ul>	<ul style="list-style-type: none"> <li>IUCN is UNESCO's technical advisor on biodiversity and has an important influence</li> </ul>	H
<b>FEM</b> (sites RAMSAR)	CBG may impact negatively on their mission	FEM has an important influence and opposition can block project	H
<b>UNEP</b>	CBG may impact negatively on their mission	UNEP named as possible agency to involve in Environmental. Convention	L
<b>NGOs (currently active in West Africa)</b> <ul style="list-style-type: none"> <li>Conservation International (CI)</li> <li>World Wildlife Fund (WWF)</li> <li>Bird Life Intl.</li> <li>Sylvatrop</li> <li>Centre d'Environnement et de Développement Intégré (CEDI)</li> <li>KFW</li> <li>Jane Godall</li> <li>Wild Chimpanzee Foundation (WCF)</li> </ul>	<ul style="list-style-type: none"> <li>CBG impacts on their biodiversity conservation mission</li> <li>Opportunities for research, conservation programmes and to develop Environmental convention</li> <li>Project could be seen to undermine international best practice norms and standards</li> </ul>	<ul style="list-style-type: none"> <li>May criticise project's impact on biodiversity</li> <li>May make demands re. the Project's biodiversity performance</li> <li>Possible involvement in environmental &amp; social program</li> </ul>	H
<b>Intl. advocacy NGOs</b> <ul style="list-style-type: none"> <li>Friends of the Earth</li> <li>Greenpeace</li> <li>Environmental Defense Fund (EDF)</li> <li>Global Witness (GW) Global Witness (GW)</li> </ul>	<ul style="list-style-type: none"> <li>CBG potentially impacts on their mission</li> </ul>	<ul style="list-style-type: none"> <li>Could create negative/positive publicity</li> <li>Could stage protest demonstrations</li> <li>Lobby Forum for Corporate Responsibility, UNESCO, BoD and shareholders, causing delays and (worst case) decision to withdraw</li> </ul>	H
<b>National ENGO</b> <ul style="list-style-type: none"> <li>Guinée Ecologie (Envt watch-dog of Guinean mining sector)</li> <li>PGCT/PGCMB</li> </ul>	<ul style="list-style-type: none"> <li>Are interested in setting environmental &amp; social standards for mining in Guinea</li> </ul>	<ul style="list-style-type: none"> <li>Could criticise CBG for bad performance or defend for good performance</li> </ul>	M
<b>International NGO</b>	<ul style="list-style-type: none"> <li>For others, if they intend to work in the area CBG can</li> </ul>	<ul style="list-style-type: none"> <li>Can assist CBG to alleviate poverty and pressures on WHS/BR</li> </ul>	M

<ul style="list-style-type: none"> <li>FAO/FIDA, AFD, Coopération Française, UNICEF, Charente Maritime, Aide Action, CECI, IDA, WHO</li> </ul>	<ul style="list-style-type: none"> <li>provide opportunities and support for development programmes</li> </ul>	<ul style="list-style-type: none"> <li>Share data with CBG</li> <li>May criticise CBG for bad performance or defend for good performance</li> </ul>	
<b>Other International NGO</b> <ul style="list-style-type: none"> <li>USAID/OPIC</li> </ul>	<ul style="list-style-type: none"> <li>Non application des standards sociaux recommandés par ces institutions</li> <li>For others, if they intend to work in the area CBG can provide opportunities and support for development programmes</li> </ul>	<ul style="list-style-type: none"> <li>Fournir un support financier à la CBG pour le développement de son projet</li> <li>Can assist CBG to alleviate poverty and pressures on WHS/BR</li> <li>Share data with CBG</li> <li>May criticise CBG for bad performance or defend for good performance</li> </ul>	<b>E</b>
<b>National Development NGOs</b> <ul style="list-style-type: none"> <li>INAASPO, CAD, BERCA BARA, PACV</li> <li>Association ressortissants CRD : Kamsar, Kolaboui, Boké, Tanènè, Sangarédi, Daramagnaki, Missira, Weidou Mbour et Koumbia</li> </ul>	<ul style="list-style-type: none"> <li>CBG could overwhelm their programmes in CBG area</li> <li>CBG may provide support for their programmes</li> </ul>	<ul style="list-style-type: none"> <li>Could criticise or support CBG at local and National levels</li> <li>Could provide on-the-ground technical expertise</li> </ul>	<b>L</b>
<ul style="list-style-type: none"> <li>International and National Research institutes</li> </ul>	<ul style="list-style-type: none"> <li>Material support</li> <li>Opportunity to increase scientific knowledge</li> </ul>	<ul style="list-style-type: none"> <li>Enhance (scientific) credibility of project</li> <li>Criticise lack of scientific credibility of CBG work</li> <li>Expertise</li> </ul>	<b>M</b>
<ul style="list-style-type: none"> <li>Scientific Advisory Panel/Group (to be constituted)</li> </ul>	<ul style="list-style-type: none"> <li>Enhances visibility of participants</li> <li>May impacts on reputation of participants</li> <li>May contribute to leading practice in corporate responsibility</li> </ul>	<ul style="list-style-type: none"> <li>Could enhance technical/scientific quality and credibility of environmental &amp; social programmes</li> <li>May criticise/reject technical/scientific quality of CBG E&amp;S studies and programmes</li> </ul>	<b>M</b>
<ul style="list-style-type: none"> <li>Major Mining companies operating in Guinea</li> </ul>	<ul style="list-style-type: none"> <li>Similar interests</li> <li>Benchmarking</li> </ul>		<b>L</b>
<ul style="list-style-type: none"> <li>EGA/GAC, Rio Tinto/ SIMFER, Russal, SMFG, Anglo-Ashanti Gold, HENAN Chine, COBAD</li> </ul>	<ul style="list-style-type: none"> <li>Share benchmarking on social, environmental, fiscal, infrastructural, labour, profitability issues</li> </ul>		<b>H</b>
<ul style="list-style-type: none"> <li>Mineral Mining &amp; Development Community</li> </ul>	<ul style="list-style-type: none"> <li>Damage to reputation/integrity</li> <li>Improvement of reputation/ integrity</li> </ul>	<ul style="list-style-type: none"> <li>Provide Support</li> <li>Stage Protest</li> </ul>	<b>M</b>
<ul style="list-style-type: none"> <li>Guinean Chamber of Mines</li> <li>ANAIM</li> </ul>	<ul style="list-style-type: none"> <li>Improve reputation, fund, invigorate, focus is on CSR issues more</li> <li>Non respect ou violation des conventions sur l'accord de concession</li> <li>Fournie des recettes et services à l'ANAIM</li> <li>Supporter l'ANAIM dans son fonctionnement</li> </ul>	<ul style="list-style-type: none"> <li>Avenue to seek common voice w/other mining companies (underutilised)</li> <li>Aider la CBG dans le règlement des conflits avec les communautés</li> <li>Supporter CBG dans les investissements au développement des communautés riveraines</li> <li>Supporter CBG dans l'augmentation de la production par l'amélioration de la qualité des infrastructures</li> </ul>	<b>H</b>
<ul style="list-style-type: none"> <li>Comité Technique (CT)</li> <li>Comité Cosultatif (CC)</li> <li>Conseil d'Administration (CA)</li> </ul>	<ul style="list-style-type: none"> <li>Improve reputation, fund, invigorate, focus is on CSR issues more</li> </ul>	<ul style="list-style-type: none"> <li>Appui à la CBG dans l'amélioration de ses différentes Performances (ISO9001, 14001 et OSHA 18001...)</li> <li>Allocation de ressources supplémentaires</li> <li>Approbation des différents budgets</li> </ul>	<b>E</b>
<ul style="list-style-type: none"> <li>ICMM</li> </ul>	<ul style="list-style-type: none"> <li>CBG is a potential reputational risk to ICMM (World Heritage Sites are strict No-Go areas to members)</li> <li>CBG potentially undermines international best practice standards and norms</li> </ul>	<ul style="list-style-type: none"> <li>ICMM may want to evaluate project &amp; object or support project after</li> </ul>	<b>L</b>
<ul style="list-style-type: none"> <li>ITIE</li> </ul>	<ul style="list-style-type: none"> <li>Non respect ou violation des principes lies aux ITIE</li> </ul>	<ul style="list-style-type: none"> <li>Amener la CBG au respect des engagements vis à des parties prenantes</li> <li>Appuyer la dans le processus de développement des communautés riveraines</li> <li>Aider la CBG à améliorer son image vis-à-vis des communautés</li> </ul>	<b>H</b>
<ul style="list-style-type: none"> <li>MMSD</li> <li>World Bank Group (IFC, IDA, IBRD, MIGA)</li> </ul>	<ul style="list-style-type: none"> <li>CBG is a potential reputation risk to the mining industry (if CBG fails to meet their standards)</li> </ul>	<ul style="list-style-type: none"> <li>CBG may be criticised</li> <li>Fournir un support financier à la CBG pour le développement de son projet</li> </ul>	<b>E</b>
<ul style="list-style-type: none"> <li>Diplomatic agencies</li> </ul>	<ul style="list-style-type: none"> <li>Information about the project (knowing what is going on in the country)</li> </ul>	<ul style="list-style-type: none"> <li>Informal link to Guinean government</li> <li>Provide certain security</li> </ul>	<b>L</b>
<ul style="list-style-type: none"> <li>Ambassadors: USA, UK, EU, France, Germany, Japan, Afrique du sud</li> </ul>	<ul style="list-style-type: none"> <li>Seeks knowledge about in-country activities</li> <li>May seek partners for external aid delivery</li> </ul>	<ul style="list-style-type: none"> <li>Can facilitate introductions for CBG to key people in Govt Provide security and info</li> <li>May lobby for the project</li> <li>May criticise the project</li> </ul>	<b>M</b>

• China	• Keen to secure access to iron, bauxite, other minerals	• May build infrastructure (power, transportation) in Guinea • Seek access to land held by CBG • May seeks to buy ore	L
• Consultants/contractors to the project; ore buyers	• Job opportunity • Damage/boost of reputation –	• Damage/boost reputation • Expertise	M
• Local / National Contractors/Suppliers • Ref. Contractor register	• Job opportunities • Opportunity to enhance/damage reputation	• CBG may enhance its reputation if it uses local/national contractors • Risk of damaged reputation if opposite occurs	M
International Contractors/Suppliers • Geoprospects • MES • Géocontrol • Tounyne • TOTAL • ASC – Machinery • VERITAS • NKM-NKF • ESS • WAC	• Job opportunities in a country w/ big mining upside • Potential to enhance reputation • Potential to damage reputation	• May enhance the quality /reputation of work/research of CBG • May damage the quality /reputation of work/research of CBG	M
• Ore Buyers (alumina; bauxite)	• Source long-term ore supply • Risk to reputation if CBG ore is considered “environmentally unsafe”	• Could damage CBG reputation • Shift in markets (Europe , Asia and Afrique) • Lower revenues	M
• Press	• Information/scoop	• Raise profile • Information-misinformation • Support – undermine reputation	H
• Local (radio principally): Radio CBG, Radio rurale locale Boke, Gaoualet Télimilé, Espace fm	• CBG can provide information/ scoop	• Could support or undermine CBG reputation • Local support for or opposition to project	L
• National newspapers : Groupe Lynx-Lance, Indépendant, Vérité, Observateur et Horoya • National télévision and radio : Koloma • Private radio : Famila fm, Sabari fm, Nostalgie,	• CBG can provide information/ scoop • Enhance visibility of stakeholder	• Could enhance or damage reputation of CBG • Could stimulate local support for or opposition to project	H
• International (newspapers, Journal, internet, television)	• CBG can provide information/ scoop • Enhance visibility of stakeholder	• Could enhance or damage reputation • Could influence BoDs and share-holders and affect continuation of the project	H
• Guinean Government (National/Provincial/Prefectural)	• Revenue/Foreign currency • Improved infrastructure • Capacity building • Prestige • Support • Lack of control • Loss of credibility in international sphere	• Right/prohibition to operate • Imposition of legislation • Protection of the company • Promote negative positive image of CBG	H
Ministry of Mines & Geology	• Desire to have mineral resources used	• Can protect CBG • Provide audits • Evaluates performance • Can grant or withhold further mineral permits in Guinea to CBG	H
Ministry for Environment	• Material support • Prestige • Fear of not being able to control environmental. impacts • Capacity-building opportunities • Opportunities for conservation research & development initiatives • Increased pressure on WHS due to immigration and	• Provides Permits • Can promote nationally/ internationally a positive or negative image of CBG • Can delay or block project by interpreting/enforcing environmental. law & regulations	H

	loss of species due to mining		
<ul style="list-style-type: none"> <li>• Dir. Nationale des Eaux et Forêts</li> <li>• Bureau des Stratégies et Développement</li> <li>• Division de la Faune (Fauna)</li> <li>• Division des Eaux (Water)</li> <li>• Division des Forêts (Forests)</li> <li>• Inspection Régionale Eau et Forêt de Boké et Kindia</li> <li>• Direction Préfectorale de l'environnement eau et forêt : Boké, Boffa et Télémélé</li> <li>• Section préfectorale eau et forêt Boké, Boffa et Telimele</li> <li>• Cantonnement forestier : Sangaredi, Kolia, Lisso, Tamita, Daramagnaki, Missira et Konsotami</li> </ul>	<ul style="list-style-type: none"> <li>• Fear of environmental. impacts</li> <li>• Capacity-building opportunities</li> <li>• Material support.</li> </ul>	<ul style="list-style-type: none"> <li>• Has a permitting role to play</li> <li>• Can promote a positive or negative image of CBG nationally /internationally</li> <li>• Rehabilitation program support</li> </ul>	<b>M</b>
Ministry of Finance	<ul style="list-style-type: none"> <li>• Significant source of revenue</li> </ul>	Imposes fiscal regime that influences: <ul style="list-style-type: none"> <li>• Operating costs</li> <li>• IRR</li> <li>• ability to import/export</li> <li>• Periodic audits</li> </ul>	<b>L</b>
<b>Ministry of Higher Education and Scientific Research</b> <ul style="list-style-type: none"> <li>• Division of Scientific Research</li> <li>• National MAB Com</li> <li>• Division of Higher Education</li> <li>• Institut Supérieur des Mines et Géologie de Boké</li> <li>• Universités de Conakry</li> <li>• CERE, IRVAG, IRAG, ENATEF Mamou</li> <li>• Collège Technique de Boké et de Kindia</li> </ul>	<ul style="list-style-type: none"> <li>• Fear that their mandate may be ignored by CBG</li> <li>• Capacity-building opportunities</li> <li>• Opportunities for research collaboration</li> <li>• Possible contracts (technical services)</li> <li>• Prestige</li> <li>• Material support</li> <li>• Bursaries/Scholarships for students</li> <li>• Placement for students, graduates and teachers</li> <li>• Recruitment</li> </ul>	<ul style="list-style-type: none"> <li>• May try to impose themselves in addition to MoU</li> <li>• May promote a positive or negative image of CBG nationally/ internationally</li> <li>• Source of graduates, services and technical assistance</li> <li>• Talent pool to draw on</li> <li>• Expertise</li> </ul>	<b>L</b>
Ministry of Transportation	<ul style="list-style-type: none"> <li>• Source of funds for technical studies</li> </ul>	<ul style="list-style-type: none"> <li>• Will evaluate CBG's conclusion on the viability of the option</li> </ul>	<b>L</b>
Ministry of Public Works	<ul style="list-style-type: none"> <li>• Mine involves large public works</li> </ul>	<ul style="list-style-type: none"> <li>• May influence the transportation choice</li> </ul>	<b>L</b>
Ministry of Labour	<ul style="list-style-type: none"> <li>• May impact negatively on labour practices in Guinea</li> </ul>	<ul style="list-style-type: none"> <li>• May criticise the project for labour practices</li> </ul>	<b>L</b>
Ministries of Health and Education	<ul style="list-style-type: none"> <li>• Material support</li> <li>• Opportunities for collaboration public health and education programmes</li> </ul>	<ul style="list-style-type: none"> <li>• Imposes regulatory standards re. health</li> <li>• May enhance CBG reputation</li> <li>• May provide partnership</li> </ul>	<b>L</b>
Ministry of 'Urbanisme'	<ul style="list-style-type: none"> <li>• Possible impact on Boké, Télémilé and Gaoual through staff villages/influx of people</li> </ul>	<ul style="list-style-type: none"> <li>• Imposes regulatory standards re. urban development</li> </ul>	<b>L</b>
<b>Ministère de l'agriculture et du développement rural</b> <ul style="list-style-type: none"> <li>• DPDR, SANPCA, SPGR, SPRR</li> <li>• Développement Rural: : Kamsar, Kolaboui, Boké, Tanènè, Sangaredi, Daramagnaki, Missira, Weidou Mbour et Koumbia</li> </ul>	<ul style="list-style-type: none"> <li>• CBG to contribute to rural development in Boké, Télémilé and Gaoual Prefectures</li> <li>• Capacity building opportunities</li> <li>• Material support</li> </ul>	<ul style="list-style-type: none"> <li>• Potential partner for rural development and gender programmes (CBG community support programme)</li> </ul>	<b>L</b>
<b>Ministère de l'élevage</b> <ul style="list-style-type: none"> <li>• Direction Préfectorale : Boké, Télémilé and Gaoual</li> <li>• Poste vétérinaire : Kamsar, Kolaboui, Boké, Tanènè, Sangaredi, Daramagnaki, Missira, Weidou Mbour et Koumbia</li> </ul>	<ul style="list-style-type: none"> <li>• CBG to contribute to rural development in Boké, Télémilé and Gaoual Prefectures</li> <li>• Capacity building opportunities</li> <li>• Material support</li> </ul>	<ul style="list-style-type: none"> <li>• Potential partner for rural development (part of CBG community support programme)</li> </ul>	<b>L</b>
<b>Ministère de la Pêche et de l'Aquaculture</b> <ul style="list-style-type: none"> <li>• Direction Préfectorale de la Pêche : Boké</li> <li>• Centre de recherche halieutique de Boussoura</li> </ul>	<ul style="list-style-type: none"> <li>• CBG to contribute to rural development in Boké, Télémilé and Gaoual Prefectures</li> <li>• Capacity building opportunities</li> <li>• Material support</li> </ul>	<ul style="list-style-type: none"> <li>• Potential partner for rural development (part of CBG community support programme)</li> </ul>	<b>L</b>
<b>Ministère de la Jeunesse et Sport</b>	<ul style="list-style-type: none"> <li>• Soutien matériel</li> </ul>	<ul style="list-style-type: none"> <li>• May agitate for support or resistance re the project</li> </ul>	<b>L</b>

<ul style="list-style-type: none"> <li>• DPJ: Boké, Boffa et Telimele</li> <li>• DSPJ : Kamsar, Kolaboui, Boké, Tanènè, Sangaredi, Daramagnaki, Missira, Weidou Mbour et Koumbia</li> </ul>	<ul style="list-style-type: none"> <li>• Infrastructure</li> <li>• Education opportunities</li> <li>• Livelihood and employment opportunities</li> <li>• Immigration</li> </ul>	<ul style="list-style-type: none"> <li>• Labour/ Emploi</li> <li>• Provision of goods/services</li> </ul>	
<b>Ministère des Arts et Culture</b> <ul style="list-style-type: none"> <li>• Direction Nationale des Arts</li> <li>• Direction Nationale de la Culture</li> <li>• Direction du Musée Préfectoral de Boké</li> </ul>	<ul style="list-style-type: none"> <li>• Soutien Matériel et logistique</li> <li>• Mutation sur le plan culturel dans la zone du projet</li> <li>• Affecter les coutumes et moeurs dans les communautés affectées</li> </ul>	<ul style="list-style-type: none"> <li>• Peut Fournir des informations d'ordre culturel au projet</li> <li>• Peut Promouvoir ou saper l'image du projet</li> </ul>	L
<b>Ministère du Plan et Coopération Internationale</b> <ul style="list-style-type: none"> <li>• DRP : Boké et Kindia</li> <li>• DPP : Boké, Télililé and Gaoual</li> <li>• Section Suivi-Evaluation : Boké, Télililé and Gaoual</li> </ul>	<ul style="list-style-type: none"> <li>• Soutien matériel</li> <li>• Peuvent ignorer les Plans stratégiques de développement</li> </ul>	<ul style="list-style-type: none"> <li>• Peuvent Fournir des prestations au projet</li> <li>• Peuvent Fournir des données statistiques au projet</li> </ul>	L
<b>Ministère de la Justice et Garde des Sceaux</b> <ul style="list-style-type: none"> <li>• TPI : Boké, Télililé and Gaoual</li> </ul>	<ul style="list-style-type: none"> <li>• Soutien materiel</li> <li>• Infrastructure</li> </ul>	<ul style="list-style-type: none"> <li>• Peuvent Fournir des prestations au projet</li> </ul>	L
<b>Ministère de la Décentralisation et du Développement Local</b> <ul style="list-style-type: none"> <li>• Direction Nationale de la Décentralisation</li> <li>• Direction Nationale du Développement Local</li> <li>• SGCD, DMR, COC</li> <li>• Commune Urbaine : Boké, Télililé and Gaoual</li> <li>• CR : Kamsar, Kolaboui, Boké, Tanènè, Sangaredi, Daramagnaki, Missira, Weidou Mbour et Koumbia</li> <li>• Districts/Villages de la concession</li> </ul> <b>Ministère de l'administration du Territoire et des Affaires Politiques</b> <ul style="list-style-type: none"> <li>• Gouvernorat : Boké et Kindia</li> <li>• Préfecture : Boké, Télililé and Gaoual</li> <li>• SGAA : Boké, Télililé and Gaoual</li> <li>• Sous-préfecture : Kamsar, Kolaboui, Boké, Tanènè, Sangaredi, Daramagnaki, Missira, Weidou Mbour et Koumbia</li> </ul>	<ul style="list-style-type: none"> <li>• Major injector of cash;</li> <li>• Increase demand for international standard goods &amp; services;</li> <li>• Immigration</li> <li>• Infrastructure</li> <li>• Investment</li> <li>• Development</li> <li>• Employment</li> <li>• Inflation</li> <li>• Social, cultural and livelihood changes</li> <li>• Revenues</li> <li>• Potential negative visual/ water resources/health/noise impacts)</li> <li>• Increased competition for resources due to immigration Negative impacts on available farmland</li> <li>• Physical safety</li> </ul>	<ul style="list-style-type: none"> <li>• Can provide support</li> <li>• Provide a pool of potential employees for CBG</li> <li>• Provide a pool of potential local suppliers for CBG</li> <li>• May protest against the Project</li> <li>• Local knowledge on process/ conditions</li> </ul>	E
Ministère Affaires Sociales, Promotion Féminine et Enfance	<ul style="list-style-type: none"> <li>• Material support</li> <li>• Infrastructure</li> <li>• Development initiatives/ enhanced standard of living</li> <li>• Employment opportunities</li> <li>• Increased health / hygiene risks improvements</li> <li>• Education opportunities</li> <li>• Changed social mores</li> <li>• Amélioration des conditions de travail des femmes</li> <li>• Instabilité dans les foyers</li> </ul>	<ul style="list-style-type: none"> <li>• Responsible for health /hygiene and education of children</li> <li>• Provision of goods &amp; services</li> </ul>	L
<ul style="list-style-type: none"> <li>• Ministère de l'Industrie et PME</li> <li>• Ministère de l'hydraulique et Energie</li> </ul>	<ul style="list-style-type: none"> <li>• Material support</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of goods &amp; services</li> </ul>	L
Elders, founding families of villages	<ul style="list-style-type: none"> <li>• Immigration and new wealth in youth are threats to their authority (managing relations with external agents, land use decisions, dispute resolution)</li> </ul>	<ul style="list-style-type: none"> <li>• Can mobilise public opinion positively or negatively for CBG</li> <li>• Can give or withhold traditional approvals</li> </ul>	L
Woman	<ul style="list-style-type: none"> <li>• Development initiatives/ enhanced standard of living</li> <li>• Employment opportunities</li> <li>• Increased health risks/improvements</li> <li>• Education opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• Responsible for health and education of children</li> <li>• Provision of goods &amp; services</li> </ul>	L

	<ul style="list-style-type: none"> <li>• Changed social mores</li> </ul>		
Youth	<ul style="list-style-type: none"> <li>• Education opportunities</li> <li>• Livelihood and employment opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• May agitate for support or resistance re the project,</li> <li>• Labour</li> <li>• Provision of goods/services</li> </ul>	L
Economic groups: <ul style="list-style-type: none"> <li>• Farmers</li> <li>• Animal husbandry</li> <li>• Fishermen</li> <li>• Hunters</li> <li>• Craftsmen</li> <li>• Natural resources product producers (palm oil, charcoal, raffia, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>• Material support</li> <li>• Capacity-building support Marketing opportunities</li> <li>• Destruction des zones de production</li> </ul>	<ul style="list-style-type: none"> <li>• Goods/services</li> </ul>	E
Healers	<ul style="list-style-type: none"> <li>• Possible disruption of traditional practices and beliefs</li> <li>• Loss of access to traditional remedies</li> </ul>	<ul style="list-style-type: none"> <li>• Provision of goods &amp; services</li> </ul>	L
Churches, Mosques, Animist societies	<ul style="list-style-type: none"> <li>• Immigration will alter religious balance</li> <li>• Local leaders may be displaced</li> <li>• Islam/Christianity likely strengthened over animism</li> </ul>	<ul style="list-style-type: none"> <li>• May influence public opinion re the project community</li> </ul>	L
Security forces (police, border guards, military)	<ul style="list-style-type: none"> <li>• Material support</li> </ul>	<ul style="list-style-type: none"> <li>• Reputation risk around whether they abide by Principles on Human Rights</li> </ul>	L
• Guinean Trade Unions	<ul style="list-style-type: none"> <li>• Good employment/ recruitment policy</li> </ul>	<ul style="list-style-type: none"> <li>• Labour may strike Labour may enhance/damage CBG reputation</li> </ul>	L
• Workforce	<ul style="list-style-type: none"> <li>• Fair/unfair employment conditions</li> <li>• Relative deprivation local and expat labour</li> </ul>	<ul style="list-style-type: none"> <li>• Labour may strike</li> <li>• Labour may perform well not well</li> </ul>	L
<ul style="list-style-type: none"> <li>• Major Private nearest enterprises : (CBG, GAC, HENAN CHINE, Russal, Entreprise de Granite)</li> </ul>	<ul style="list-style-type: none"> <li>• Competition for labour</li> <li>• Benchmarking</li> <li>• Logistical assistance</li> <li>• Exchange of experience/ good practice</li> </ul>		L
<ul style="list-style-type: none"> <li>• Local Service providers (NGO and Profit organisation)</li> </ul>	<ul style="list-style-type: none"> <li>• Building capacity</li> <li>• Employment</li> <li>• Receiving funding</li> </ul>	<ul style="list-style-type: none"> <li>• Labour</li> <li>• Goods/Services</li> <li>• Support – protest</li> <li>• Local knowledge on process/ conditions</li> </ul>	L
<ul style="list-style-type: none"> <li>• Registered NGOs : CEFACAM, CAM, CADI, UNION BORA MALE, APEK/AGRICULTURE</li> <li>• Credit Rural de Guinee, BICIGUI, ECOBANK, SGBG, Pride Finance, PAM, CICR</li> <li>• Local businesses (often individuals) and EGB, BATIPRO, BCEP, Tomba, STI, BET, BEL (Bureau Etude la Forêt), TPE-CBG</li> </ul>	<ul style="list-style-type: none"> <li>• Building capacity</li> <li>• Employment</li> <li>• Receiving funding</li> </ul>	<ul style="list-style-type: none"> <li>• May provide goods/services</li> <li>• Cost-effective manner to mobilise local knowledge to deliver services to communities</li> <li>• May support or protest against the project</li> </ul>	L
• Shareholders/Directors	<ul style="list-style-type: none"> <li>• Falling/rising</li> <li>• share price Reputation-credibility</li> </ul>	<ul style="list-style-type: none"> <li>• Support, delay or stop the project</li> </ul>	H
• Corporate HSEC	<ul style="list-style-type: none"> <li>• Adherence to corporate policy, norms</li> <li>• commitments Credibility &amp; reputation of company (positive or negative)</li> </ul>	<ul style="list-style-type: none"> <li>• Support, delay or stop the project</li> </ul>	H
• Board of Directors	<ul style="list-style-type: none"> <li>• Credibility &amp; reputation of company</li> <li>• Share price</li> <li>• Potential access to new (sensitive) ground</li> </ul>	<ul style="list-style-type: none"> <li>• Approve, delay or stop the project</li> </ul>	H
• Shareholders	<ul style="list-style-type: none"> <li>• Changes in share price</li> <li>• Pride or disappointment</li> </ul>	<ul style="list-style-type: none"> <li>• May put pressure on BoD through investing or disinvesting</li> </ul>	M

## APPENDICES

### **Appendix 9.17 Environmental and Social Management Plan (ESMP)**





**Environmental and Social Impact Assessment  
27.5 MTPA Expansion**

**ENVIRONMENTAL AND SOCIAL  
MANAGEMENT PROGRAM**

**December 2014  
English Translation September 2015**



**Compagnie des Bauxites  
de Guinée**

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## **27.5 MTPA Expansion (CBG)**

Environmental and Social Management Program

December 2014

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## TABLE OF CONTENTS

<b>TABLE OF CONTENTS .....</b>	<b>i</b>
<b>LIST OF FIGURES .....</b>	<b>iii</b>
<b>LIST OF TABLES .....</b>	<b>iii</b>
<b>SECTION 1: INTRODUCTION .....</b>	<b>iii</b>
1.1. Background and objectives .....	1
1.2. Project description .....	2
1.3. Document contents .....	2
<b>SECTION 2: MANAGEMENT OF HYGIENE, SAFETY, ENVIRONMENT &amp; COMMUNITIES .....</b>	<b>4</b>
2.1. Overview .....	<b>Error! Bookmark not defined.</b>
2.2. Community Quality, Safety and Environment Policy .....	4
2.3. Roles and responsibilities .....	5
2.3.1. Administrator – Expansion Project .....	5
2.3.2. Project Director .....	6
2.3.3. HSEC Manager – Expansion Project .....	6
2.3.4. CBG senior management (including the CBG HSEC Director) .....	8
2.3.5. Superintendents, Supervisors, Foremen .....	8
2.3.6. Employees (including contractors) .....	9
2.3.7. Visitors .....	9
2.3.8. Public consultation and participation .....	9
<b>SECTION 3: HSEC MANAGEMENT SYSTEM INTEGRATED WITH EXPANSION PROJECT .....</b>	<b>10</b>
3.1. Safety integrated into study phase (prefeasibility & detailed engineering) .....	10
3.2. Safety during construction phase .....	12
3.3. Training and skill development .....	12
3.4. Control and monitoring .....	13
3.4.1. HSE performance indicators .....	13
3.4.2. Complaints register (grievance settlement) .....	14
3.4.3. Annual report .....	14
3.4.4. Compliance audits .....	14
3.4.5. Management review and improvement .....	15
3.4.6. Document control .....	15

<b>SECTION 4:</b>	<b>MITIGATION MEASURES REGISTER .....</b>	<b>16</b>
4.1.	Introduction .....	16
4.1.1.	Air Quality .....	17
4.1.2.	Greenhouse gas .....	19
4.1.3.	Noise and vibrations .....	19
4.1.4.	Water quality and sediments.....	20
4.1.5.	Miscellaneous (soil management, waste and hazardous substances).....	21
4.1.6.	Biodiversity.....	23
4.1.7.	Social and Demographic Structure .....	24
4.1.8.	Safety and health of communities .....	25
4.1.9.	Basic infrastructure ands services .....	25
4.1.10.	Economic environment and household strategy .....	27
4.1.11.	Access to land, resettlement and compensation .....	28
4.1.12.	Governance and social cohesion .....	35
4.1.13.	Communication and Information .....	36
4.1.14.	Traffic and Transport.....	39
4.1.15.	Cultural heritage and archeological sites .....	40
4.2	Mitigation undertakings for the Project.....	43

## LIST OF FIGURES

Figure 1.1: Location of Project and CBG facilities in Study Area .....	3
Figure 2.1: HSEC Management Organization.....	7
Figure 3.1: Risk control hierarchy.....	11
Figure 4.1: Structure of the community relation section .....	34

## LIST OF TABLES

Table 3.1: Examples of performance indicators to be used in the Project .....	14
Table 4.1: WHO Guideline on Air Quality .....	18
Table 4.2: Additional RAP necessary for the operation of the mine (SoC) .....	35

## **SECTION 1: INTRODUCTION**

### **1.1. Background and objectives**

As part of the project to expand the operations of the Compagnie des Bauxites de Guinée (CBG), an environmental and social impact assessment (ESIA) was conducted in order to gather baseline data on the physical, biological and social environments. After these data were analyzed, an exhaustive study was made of the environmental and social impacts. Through methodical assessments, the significance of the anticipated impacts was quantified and an order of priority was developed for mitigation measures designed to prevent, reduce or control those impacts.

The data, impact analyses and mitigation measures provide a tool for identifying the main environmental and social issues associated with the Project and constitute the basis for the process of implementing the mitigation measures which were identified in the ESIA and environmental audit and which are summarized in this Environmental and Social Management Plan (ESMP).

It is important to note that this ESMP was drawn up specifically for the Project and not for all CBG activities. Nevertheless, some of the measures proposed in this ESMP will also apply to the environmental and social management plan for all of CBG's operations. Others have already been implemented, in full or in part, as part of CBG's daily operations. Some of the mitigation measures in the ESMP address existing activities that are already among the priorities identified in CBG's environmental and social management plan, and some have already been implemented. At an operational level, the actions identified in this document will be incorporated into the actions and procedures of CBG's environmental and social management plan.

One objective of this ESMP is to make sure the Project complies with international and Guinean environmental and social legislation and requirements throughout the four Project phases: design, construction, operations and closure. Given the importance given by the Republic of Guinea to biodiversity, demonstrated in its laws, action plans and international conventions it has ratified, CBG reaffirms its adherence to the principles and recommendations of these texts and reminds them to its employees and subcontractors.

At the national level, in accordance with articles 82 and 83 of "Ordonnance N°045/PRG/87 du 28 mai 1987 portant code de l'environnement de la République de Guinée" and its regulations, all public and private capital investment projects liable to harm the environment must be the subject of an impact assessment and must produce a management plan. The "Guide général de réalisation des études d'impact environnemental et social de la République de Guinée", adopted on March 11, 2013 (Arrêté N° A/2013/474/MEEF/CAB), incorporates the ESMP into the actual structure of the environmental and social impact assessment.

The Expansion Project will comply with Guinean Mining Code (2011 Mining Code), in particular with the clauses of Section III, "Relations with Third Parties".

This ESMP enables CBG to meet the performance standards of the International Finance Corporation (IFC) regarding environmental and social sustainability, and to comply with the Equator Principles on managing the environmental and social impacts of international investment projects. It is also a way of ensuring implementation of good industry practice to mitigate or improve the Project's impacts. In this way, the management plan becomes an integration tool for managing the environmental and socioeconomic aspects linked to the Project during its execution and for minimizing or mitigating its impacts.

The ESMP makes it possible to:

- apply measures for environmental protection;
- minimize the Project's impacts on the biological environment;
- minimize many socioeconomic impacts including the impact on community health;
- reduce nuisances during construction;
- facilitate the involvement or participation of local populations and organizations in the Project;
- maximize opportunities for improving living conditions;
- reduce the risk of accidents;
- ensure mining operations that are in line with the undertakings made in the ESMP and that make it possible to protect or improve the living conditions in the riparian communities affected by the Project; and
- measure CBG's performance in terms of good environmental and social management.

## **1.2. Project description**

CBG is a mining company jointly owned by the Government of Guinea and Halco Mining (Alcoa, Rio Tinto Alcan and Dadco). CBG is considering increasing its bauxite production capacity from 13.5 million tonnes per year (MTPA) of shipped material to 22.5 MTPA (at 3% moisture content) by the last quarter of 2017, followed by another 5 MTPA increase to reach a capacity of 27.5 MTPA around 2022. An intermediate stage is planned at 18.5 MTPA. The necessary studies and work are included in the overall Project schedule.

CBG extracts bauxite from its Sangarédi mine in northwestern Guinea and hauls it by rail to its facilities (plant and mineral loading port) in Kamsar (Figure 1.1). CBG was created in 1963, and its facilities have been in operation since 1973.

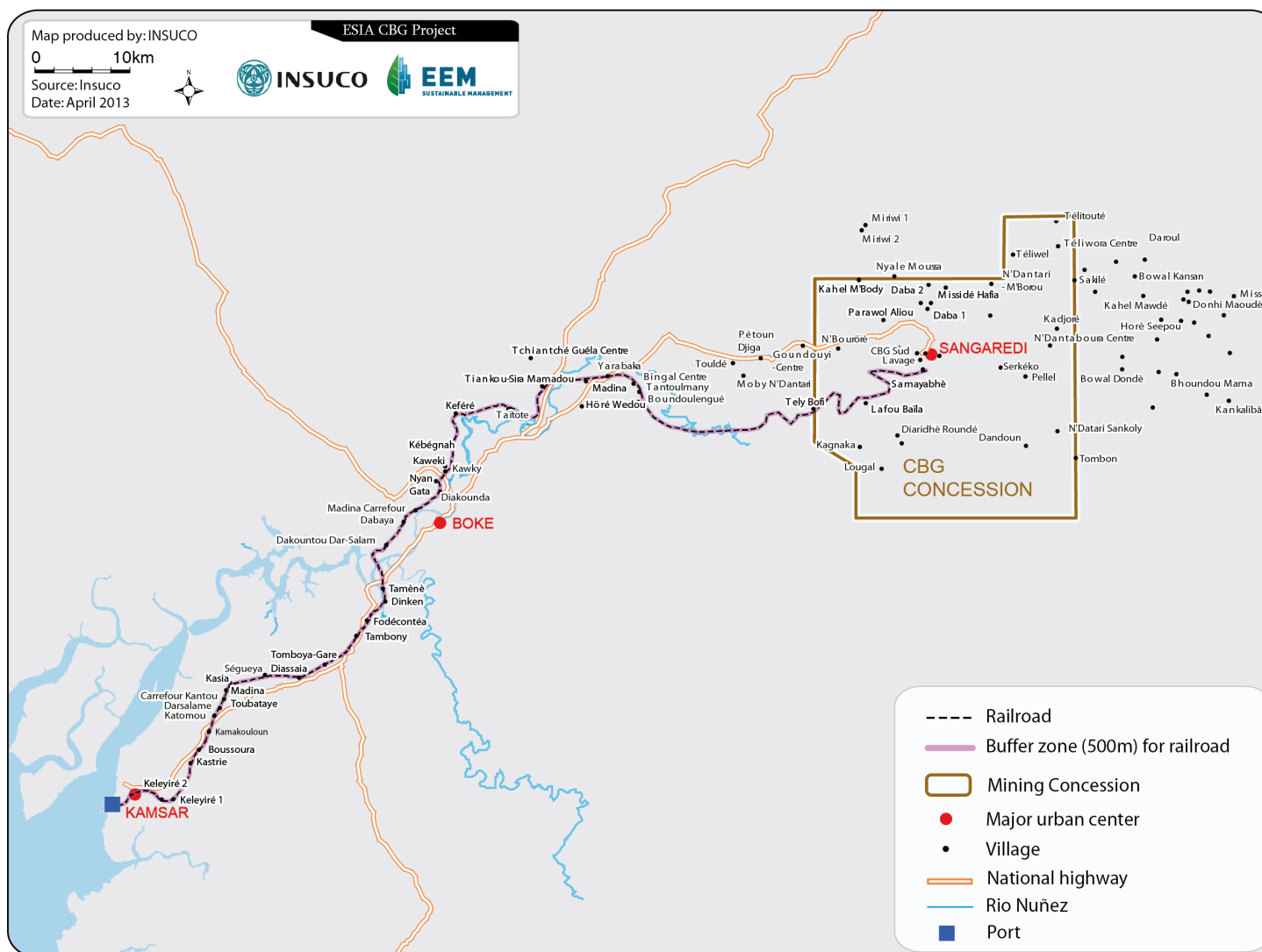
CBG's world-class Expansion Project consists of the following:

- acceleration of bauxite extraction in the Halco concession;
- increase in rolling stock (locomotives, railcars, heavy machinery, etc.);
- replacement of the dumping/crushing system at the Kamsar plant and increase in drying capacity;
- extension of mineral loading quay;
- addition of infrastructure to support increased production: construction of new shops and railroad sidings, installation of new generators, etc.

## **1.3. Document contents**

The content of this document is structured as follows:

- Section 2: a summary description of CBG, the Project's HSEC systems and the responsibilities of the various actors;
- Section 3: explains how the ESMP will be incorporated into the HSEC management system (Hygiene, Safety, Environment and Communities), including proposals for development of detailed environmental and social programs, plans and procedures, monitoring tools and audit;
- Section 4: defines the mitigation and control measures identified in the ESIA for each Project phase and component, and for each environmental and social aspect. This is presented in the form of a record of undertaking for each measure to be applied, describing:
  - what will be done to mitigate impacts and optimize benefits;
  - the Project phases to which the measure applies (design, construction, operations, closure); and
  - the components affected (mine, railroad, plant/port).



(Source: EEM. Étude d'impact environnemental et social du Projet d'extension de la CBG – Termes de référence)

**Figure 1.1 Location of Project and CBG facilities in Study Area**



## **SECTION 2: MANAGEMENT OF HYGIENE, SAFETY, ENVIRONMENT & COMMUNITIES**

### **2.1. Introduction**

CBG has an overall performance and compliance obligation in terms of health, safety and the responsible management of the environment and community relations to ensure that the conditions are met and that employees can work without danger. In the event of an injury or environmental incident, CBG will assume liability.

The following international directives guided the approach adopted for managing risks to community health, safety and security:

- IFC Performance Standard;
- IFC EHS Guidelines; and
- Mining Code of Guinea: Chapter VII – de l'environnement et de la santé.

According to IFC Performance Standard 4, the risks and impacts on health and safety to which the affected communities are exposed must be assessed, and prevention and control measures in line with industry good practice must be identified.

The CBG Expansion Project must also comply with Chapter VII of the Mining Code (2011) and with the Code de l'Environnement or the applicable international best practices (Article 142). "Appropriate techniques and methods must be used to protect the environment and the safety of the workers and Local Community in accordance with the Environmental Code or international best practices in this area." (Article 142)

### **2.2. Community Quality, Safety and Environment Policy**

According to its QSE policy, CBG's primary mission is to extract and process bauxite and ship it around the world under conditions agreed on with the customer and in compliance with its safety and environmental requirements.

CBG aspires to becoming the world's leading bauxite company in terms of health, safety and environment. Its strategy for achieving this is to set up an integrated Quality, Safety and Environment management system with employees as its driving force. Note that the community aspect will be incorporated into this QSE system and managed in such a way as to ensure its optimal integration into day-to-day management operations.

Safety and the environment are primary management and development axes for obtaining the desired economic, financial and social results. In adopting this policy, CBG set the following objectives:

- identify risks and implement preventive and remedial measures designed to eliminate or control the risks;
- develop a health and safety culture and educate employees about risks and risk control;
- create and maintain working conditions that prevent industrial disease and occupational injury;
- reduce solid waste and improve the quality of effluent and atmospheric emissions from operations, in accordance with the laws, regulations and standards in effect;
- reduce energy consumption;
- control accidental hydrocarbon spills and nuisances for neighboring residents and the environment;
- rehabilitate pits and mined areas through a five-year program;

- implement a negotiated involuntary resettlement program that will be beneficial for affected villages, in accordance with IFC Performance Standard 5 on involuntary resettlement and with the principles of sustainable development; and, more generally
- manage socioeconomic impacts on communities in a responsible manner and in compliance with Guinean law and international standards.

To achieve these objectives, CBG has undertaken to acquire sufficient resources so that teams that are motivated, efficient and in line with CBG's values can disseminate and implement this policy and continuously improve the policy and its implementation.

To demonstrate CBG Management's determination to manage this Project in a spirit of respect for health, safety, the environment and nearby communities, the Expansion Project supports CBG's Health, Safety, Environment and Communities (HSEC) Policy. In managing the Project, CBG undertakes to ensure the health and safety of all persons affected by its operations or products, and to ensure the respect of all nearby communities and the environment. CBG is confident that all its employees will rally in support of the Project team to make sure HSEC becomes an integral part of the organization's daily management.

### **2.3. Roles and responsibilities**

Development and deployment of the Expansion Project ESMP is the direct responsibility of the Project team. It will be deployed in conjunction with CBG's HSEC department and all other departments concerned before being integrated into their day-to-day activities.

Once deployed, its management will be the sole responsibility of the HSEC Manager – Expansion Project during detailed engineering, construction and commissioning, then it will be under the responsibility of CBG's HSEC Director for the operations phase.

During the detailed engineering and construction phase, the general EPCM organizational structure determines the HSE resources that will work in parallel with the Project team and will support deployment of the ESMP at their level.

The following responsibilities apply to the development, execution and maintenance of HSE systems and activities.

#### **2.3.1. Administrator – Expansion Project**

This person has ultimate responsibility for HSE management throughout the CBG Expansion Project.

More specifically, he must:

- keep employees responsible for upholding CBG's HSE policy and directives during the Project;
- pursue continuous improvement through a systematic approach in conjunction with all levels of management;
- take appropriate action, in line with standard operating practice, in the case of unacceptable performance or behavior;
- incorporate health, safety and environment into job descriptions and individual performance evaluations;
- expect all personnel to share responsibility for meeting legal requirements and maintaining accountability in terms of HSE through the roles and responsibilities defined below;
- hold weekly meetings with the Project Director;
- ensure interfacing with partners, financial institutions and the authorities for any matter pertaining to health, safety, or the proper management of the environment and community relations.

### **2.3.2. Project Director**

The Project Director is responsible for ensuring the development, execution and improvement of the ESMP as an integral part of the Expansion Project.

More specifically, he must:

- provide leadership and direction in HSEC matters by taking initiatives and inspiring others;
- provide similar leadership in the Project's social performance, working closely with the HSEC Manager;
- ensure achievement of the various targets set under the ESMP and agreed on with the regulator and the stakeholders;
- assign the human and financial resources needed to achieve the objectives;
- develop a personnel engagement plan to promote excellence and continuous improvement in HSE management in order to meet the objectives;
- comply with the legal, contractual and organizational obligations of CBG and the financial institutions;
- establish a clear chain of HSEC responsibility throughout the Project;
- establish and achieve the general HSEC objectives as part of the Project;
- include measurable HSEC objectives in personnel performance plans;
- approve and implement HSEC policies and procedures;
- make sure HSE and community relations accountability is allocated to the appropriate level of authority;
- identify needs and provide appropriate HSEC training;
- respond rapidly and positively to any health, safety or environment problem reported;
- make sure competent professionals are hired and/or internally developed;
- encourage front-line managers to act in line with best practices at all Project sites;
- demonstrate firm commitment in terms of diligent reporting of HSEC incidents and follow-up;
- participate in HSEC audits and take all necessary steps to correct any shortcomings identified;
- formally recognize excellence in HSEC activities or initiatives where appropriate;
- bring up unresolved HSEC problems with the Project Administrator;
- hold weekly meetings with the Project Administrator;
- ensure interfacing with the EPCM contractor.

### **2.3.3. HSEC Manager – Expansion Project**

The HSEC Manager is responsible for writing and deploying the ESMP as part of the Expansion Project.

More specifically, he must:

- act as the HSEC contact for the EPCM contractors;
- enforce HSEC procedures and the targets and measures provided for in the ESMP;
- review and evaluate the HSEC management plans of contractors working on the Project;
- provide special support by acting as advisor to the directors and other members of the Project team and CBG when necessary;
- act on HSEC issues, in particular in collaboration with CBG's HSEC Director for the social and community component;
- conduct periodic internal HSEC assessments and audits in collaboration with other senior executives;
- analyze assessment/audit results, trends and incident reports;
- advise CBG and the Project managers about new processes and equipment that could have an impact on health, safety or the environment;



**2.3.4. CBG senior management (including the CBG HSEC Director)**

CBG's senior management is responsible for carrying out their duties in accordance with the HSE and community relations objectives set out in the ESMP.

More specifically, operations management must:

- execute the risk management procedure in each work site under their control;
- take all necessary steps to ensure that all identified risks are eliminated, isolated or controlled;
- inform all personnel and subcontractors of all known risks involved in their work and how to control them;
- ensure that all personnel receive appropriate training and are involved in system improvement;
- ensure that dangerous acts and conditions are treated appropriately;
- conduct regular HSE inspections and social performance reviews;
- participate in HSE audits and take steps to correct any shortcomings identified;
- ensure that all accidents and incidents are recorded, thoroughly investigated and reported to the HSEC Department for subsequent corrective measures;
- encourage good HSE and social performance from suppliers and subcontractors;
- take leadership in effective HSEC management;
- encourage initiatives to deploy ESMP provisions correctly, including social provisions;
- respond rapidly and positively to the identification of problems related to HSEC or the site's social performance;
- work with employees, supervisors, support personnel and directors;
- encourage supervisors to report HSEC activities and problems;
- delegate responsibility to supervisors and hold them accountable for work done;
- evaluate HSEC performance and encourage development and improvement;
- promote a positive HSEC culture and encourage managers to think about how corporate decisions will impact their activities;
- submit unresolved HSE or social performance issues to Management;
- ensure implementation and efficient management of grievance mechanism.

**2.3.5. Superintendents, Supervisors, Foremen**

As front-line managers, supervisors are supposed to give a good example and participate fully in the ESMP. They are also responsible for communicating rules, regulations and performance expectations to employees and for ensuring that employees meet these requirements.

In particular, supervisors must:

- take charge of HSEC initiatives by showing exemplary leadership;
- show initiative and authority in identifying and controlling workplace hazards;
- proactively resolve HSEC problems;
- respond rapidly and positively to HSEC problems;
- encourage workers to identify hazardous behaviors and conditions (near hits);
- identify training needs and ensure employee participation in the training program provided;
- maintain a training log and keep all worker's training certificates;
- assess skills and encourage professionalism on the job;
- promote an HSEC culture;
- communicate HSEC problems and initiatives to workers;
- plan work according to CBG's HSEC rules;
- follow up with workers to make sure they are using safe work methods;
- submit unresolved HSE issues to Operations Management;

- delegate responsibility to workers and hold them accountable for their work;
- work with employees, supervisors, support personnel and directors;
- support the implementation and effective management of the grievance mechanism.

#### **2.3.6. Employees (including contractors)**

All employees must protect themselves, their co-workers and the environment surrounding the Project. They must also protect the health and safety of other companies' employees (including subcontractors and visitors) present on the jobsite, as well as the nearby communities liable to be affected by the Project.

More specifically, employees must:

- know and apply the HSEC policies, procedures and directives;
- participate in job safety analyses with their supervisor;
- follow the safe work methods;
- report any unusual actions and conditions to the supervisor;
- show initiative in controlling worksite hazards and reducing risks;
- resolve problems in their work area;
- collaborate with colleagues, supervisors and other site personnel;
- report unresolved HSEC issues to the supervisor first, then to Operations Management.

#### **2.3.7. Visitors**

All visitors to CBG facilities must cooperate with the company representative and observe the site rules and regulations.

Specifically, visitors must:

- obtain access authorization and always be escorted by a company representative while visiting the inside of a production facility;
- follow the site rules and regulations as laid out by the company representative or during the HSEC site orientation;
- address all problems related to HSEC rules and regulations to the company representative.

#### **2.3.8. Public consultation and participation**

Public consultation and participation is one of the key elements of the ESMP.

Regular consultation of the public (especially local communities and authorities), and active and continuous public participation, must lead to achievement of the following objectives:

- provide an opportunity for affected and concerned persons to express their preoccupations and to influence decision making right at the start of the Project;
- inform and raise awareness in persons or groups affected by the Project or having an interest in it or in its potential impacts;
- knowledge about the local situation and traditional values;
- reducing conflict between stakeholders (CBG, civil society, etc.);
- informed decisions, in particular regarding the most damaging impacts and the mitigation measures;
- improved transparency and responsibility for CBG;
- trust between CBG, government institutions and affected communities.

**SECTION 3: HSEC MANAGEMENT SYSTEM INTEGRATED WITH EXPANSION PROJECT****3.1. Safety integrated into study phase (prefeasibility & detailed engineering)**

Health, safety and environmental risks are managed by various means. A risk register will be developed during the hazard identification workshops to be attended by CBG, the consultants, the EPCM companies and Project Management.

It is important to note that CBG has already implemented several programs, plans and operating procedures. In this chapter, the emphasis is on identifying and controlling the additional risks associated with the Expansion Project. The risks associated with CBG's current activities will not be discussed here.

CBG and the Project team will have to incorporate the results of this assessment into the engineering work (Project design). There will be discussions on how to improve the design and implement measures for mitigating and controlling the major risks. The EPCM firm will have to take the major risks into account and develop detailed protection measures within the design to prevent those risks. It will also have to assess the mitigation measures to implement during engineering or operations in order to control the potential effects of those risks.

Risk analysis methods

Relying on best practices, the EPCM company will work with CBG to conduct the following safety reviews during the detailed engineering phase:

- an analysis of Level I industrial hazards (HAZOP), to be conducted early in the detailed engineering phase, as soon as the process design is finalized and the production flow diagrams (PFDs) have been delivered for approval. HAZOP is a quality risk analysis method that uses “guide words” and is fed by a multidisciplinary team, usually during brainstorming sessions. It consists in identifying high-level risks in order to highlight the potential risks that each engineering discipline must know about as the Project develops. The following documents are usually needed for the HAZOP analysis:
  - PFDs;
  - plant drawings; and
  - other documents.
- a detailed industrial hazard analysis (Level II), to be conducted a little later in the detailed engineering phase, during the basic engineering work. The purpose of this review is to identify events that could arise during plant operation and cause a deviation from the standard operating parameters. The potential causes and consequences will be identified, and a decision will be made as to whether additional controls must be added as a safety precaution against these scenarios.

The following documents are usually needed for this analysis:

- P&IDs;
- electrical loop diagrams;
- equipment specifications; and
- list of corrective actions.
- an exercise to determine the safety integrity level (SIL) of any high-risk critical elements among the hazards identified during the HAZOP analysis. In most cases, this will be done immediately after the HAZOP reviews.

Risk analyses will then be carried out at regular intervals during the Project, including at the following milestones:

- construction;
- preoperational testing;
- commissioning; and
- handover.

The analysis results will be made available to all Project stakeholders (personnel, contractors, subcontractors, etc.) to ensure that all actions and control measures are implemented, communicated and signed.

The aim of the risk analyses is to identify key elements to be taken into account in order to deliver safe equipment. Key elements include:

- integral protection of rotary equipment;
- ergonomics and the configuration of workstations and work areas;
- dust suppression and capture systems;
- safe access gangways (e.g., for maintenance work);
- accessible sample and monitoring points;
- anchor points built into the equipment if there is a risk of falling;
- alarms and safety systems on the machines (e.g., emergency stop button);
- lighting (number, type, performance);
- emergency equipment (e.g., showers, eye wash stations);
- signage, identification (e.g., hazards, piping);
- identification of explosion hazard areas or equipment, etc.

<b>Risk Control</b>		
The following risk control options must be considered and must be applied individually or in combination.		
1	<b>Elimination</b> Complete removal of hazard	
2	<b>Substitution</b> Replace the hazardous material or process with a less hazardous one	
3	<b>Modification</b> Modify the equipment or process <b>Isolation</b> Isolate the hazard by means of a wall or enclosure	
4	<b>Administration</b> Training, procedures or other administrative controls	
5	<b>Personal protective equipment</b> Use this option when the others are not feasible	

(Source: Fluor. Cahier d'appel d'offre)

**Figure 3.1 Risk control hierarchy**

Note that a similarly rigorous approach will be applied in the detailed identification and management of “community” risks.



### **3.2. Safety during construction phase**

During the construction phase, health and safety will be managed through a special management system that was designed in-house by the Project team and will be used by the EPCM and EPC firms, the subcontractors and all CBG teams working on the Expansion Project.

The Expansion Project team firmly believes that all accidents are preventable, and has therefore adopted a zero-accident philosophy. The health and safety management system ensures:

- prevention of injuries;
- a safe working environment;
- reduced insurance premiums;
- fewer incidents leading to Project delays;
- improved employee productivity and morale; and
- a strong corporate image for the Expansion Project.

There are over 50 policies and procedures applicable to offices, engineering and construction site operations. They are divided into 14 sections:

- Section 100 Occupational health, safety and environment
- Section 200 Roles and responsibilities
- Section 300 Risk management
- Section 400 Training
- Section 500 HSE meetings
- Section 600 Work practice controls
- Section 700 Hazardous materials management
- Section 800 Industrial hygiene
- Section 900 Equipment management
- Section 1000 Subcontractor management
- Section 1100 Community management
- Section 1200 Emergency response
- Section 1300 Document control and reporting
- Section 1400 Inspections and audits

### **3.3. Training and skill development**

At each Project phase, all employees will be given a training session on the ESMP. Individual coaching sessions will also be held with the ESMP managers to guide them in their tasks. Throughout the operations phase, each new employee will receive training. Subcontractors working on the Project must be made aware of the ESMP and must comply with its provisions. To this end, the orientation session on health, safety, environment and community relations will include an outline of the ESMP.

The objectives are:

- to inform employees about environmental and social issues;
- to enable employees to understand the mitigation and compensation measures;
- to explain the steps to follow in implementing the measures, and the employees' role in these steps; and
- to discuss emergency situations and the procedures to follow.

CBG, in collaboration with the EPCM company, will develop a health and safety training catalogue for all CBG and contractors' personnel working on the Project. Some training sessions will be mandatory for everyone, while others will be specifically for certain trades.

The training catalogue will include the following (partial list):

- job safety analysis;
- work permits;
- work in confined spaces;
- work at heights;
- hot work;
- respiratory protection;
- noise protection;
- incident management;
- accident investigation and analysis;
- safety for vehicle drivers; and
- first aid / first response.

An introduction to social and community issues and to corporate standards, the undertakings in the ESMP and the procedures implemented will be offered to all employees (or employees whose work affects local communities) and to contractors and suppliers.

The client team has developed a training plan for upgrading the skills of workers to be recruited for the Expansion Project, as well as a preliminary training plan on using the new equipment. The training plan for the intermediate 18.5 MTPA phase is available (*Rapport : Volet formation de la main d'œuvre additionnelle pour le Projet d'extension, phase 1 (18.5 Mtpa)*).

Human and material resource requirements have been estimated and planned as part of the prefeasibility study phase and will be revised during the detailed engineering study. According to the zero-based manpower budget for the Expansion Project Phase 1 (18.5 MTPA), an additional 232 employees will be needed, including 200 tradesmen (operators).

The theoretical and practical training of new employees (tradesmen) will take place over 18 months, the last six of which will be spent on specific training on operating the new equipment acquired for the Expansion Project. For this specific training, the content and the persons concerned will be identified later by the suppliers in collaboration with the Training Advisor and the departments in question.

### **3.4. Control and monitoring**

#### **3.4.1. HSE performance indicators**

The Project team will continuously measure HSE performance using indicators, audits and inspections. The typical performance indicators are shown in Table 3.1. The purpose of these indicators is to measure the progress made in comparison with the targets and to inform the teams of the results in order to ensure continuous improvement.

**Table 3.1 Examples of performance indicators to be used in the Project**

Activity	Frequency	Responsibility
Job safety observations	Daily	HSE Representative
Inspections	Weekly	HSE Representative
Audits	According to schedule	HSE Representative
Accident investigation	According to procedure	HSE Representative
HSE meetings	Monthly	Directors/Supervisors
HSE startup meeting	Daily	Supervisors
Job safety analyses	100%	Supervisors
HSE orientation compliance	100%	HSE Representative
Frequency – Accident with work stoppage	0	HSE Representative
Frequency – Recordable incidents	0.60	HSE Representative
First aid	N/A	HSE Representative
Medical treatment – Modified employment	N/A	HSE Representative
Material damage	N/A	HSE Representative
Environmental incident	0	HSE Representative
Transportation accident (train, vehicle, ship)	N/A	HSE Representative

### 3.4.2. Complaints register (grievance settlement)

CBG has set up an extrajudicial mechanism for complaint settlement and dispute management based on mediation and third-party arbitration. The steps that make up this mechanism are:

1. complaint reception and recording;
2. preliminary examination and classification;
3. complaint processing; and
4. closing of the file.

The various steps in the reception, processing and closing processes are detailed in the procedure “Mécanisme de gestion des griefs” (complaint management mechanism).

The complaint management mechanism will be announced publicly and explained to the communities to ensure that they understand it and can use it correctly.

### 3.4.3. Annual report

Regular communication of environmental results and observations is essential. For this reason, an annual report will be produced for CBG management, government authorities and local stakeholders. It will also be sent to lending institutions (such as IFC) and, where applicable, to interested NGOs and other institutions concerned.

The report will contain a copy of all final or annual reports received on the various works under way during the year (additional studies, action plans, follow-up reports, site rehabilitation, etc.) as well as monitoring reports on air quality and noise.

In addition, it will report on incidents and animal sightings (including those by drivers, jobsite managers, etc.) and will contain summaries of all meetings held with the public or with government bodies on environmental topics.

### 3.4.4. Compliance audits

Every year throughout the life of the Project, Management will mandate a third party to conduct an external audit on the ESMP to ensure that the procedures are being followed and the targets are being met. Management will receive a compliance report stating the level of compliance achieved and the areas for improvement, if any.

The aims of the external audit are to be informed on a regular basis about the direct and indirect impacts that the Project and the mining operations are having on the environment, to ensure compliance with standards, and to require the necessary remedial measures.

#### **3.4.5. Management review and improvement**

Management will systematically review the ESMP to ensure continuous improvement. The environmental, social and legal aspects, as well as the processes, objectives, targets, roles and responsibilities stated in the environmental and social management guide, will be reviewed and modified where needed in order to incorporate the improvements indicated by the compliance audits.

#### **3.4.6. Document control**

To facilitate knowledge transfer and dissemination of the ESMP, a management guide will be produced. It will incorporate all the aspects mentioned here (environmental and social policy, objectives, targets, programs, roles and responsibilities, environmental and social issues, legal and regulatory requirements, register of anticipated risks and emergency response plan) as well as procedures for environmental data archiving and updating and for personnel training.

Each document will be approved by the employees responsible and by a document controller who will number it and archive it.

A section at the end of each document must indicate when the document was updated, the changes made and the reasons for the changes.

## **SECTION 4: MITIGATION MEASURES REGISTER**

### **4.1. Introduction**

This section of the ESMP describes the mitigation measures to which the CBG Expansion Project has committed. These actions are the outcome of the Expansion Project ESIA and form the basis for the operational controls to be introduced into the HSEC management system for the Project and then for CBG as a whole. The monitoring and audit process described above will measure the performance of the Project and of CBG in terms of compliance with these actions. Specific monitoring and control plans have been defined and are listed among the actions in Section 4.2.

The mitigation measures register in Section 4.2 is organized by topic and sub-topic, and indicates the phase and specific component addressed by each measure. The categories of mitigation measures are:

- A. Management framework, programs and plans
- B. Air quality
- C. Greenhouse gases
- D. Noise and vibrations
- E. Water and sediment quality
- F. Miscellaneous (soil management, waste, hazardous substances)
- G. Biodiversity Action Plan
- H. Social and demographic structure
- I. Community safety
- J. Community health
- K. Infrastructure and basic services
- L. Economy and household strategy
- M. Access to land, resettlement and compensation
- N. Governance and social fabric
- O. Communication and information
- P. Traffic and transportation
- Q. Cultural heritage and archaeological sites

For each mitigation measure, the table indicates:

- the details of the undertaking;
- the phase during which the undertaking will apply (design, construction, operations or closure); and
- the Project component to which the undertaking will apply (mine, railroad or plant/port).

CBG is considering cumulative impacts within its area of influence in accordance with PS1 and will cooperate with any national institution or any other company which would launch work in the CBG area of influence in order to implement common mitigation measures.

Given that the review and approval of the Project's Environmental and Social Impact Assessment is moving forward, as are the permitting and authorization processes, this register will be updated according to new requirements or requests that may arise. It will also be updated if the Project scope changes or if any aspect is modified so that new mitigation measures become necessary to ensure good management of environmental and social risks and impacts.

#### **4.1.1. Air Quality**

##### Kamsar

The core data obtained from sampling done by the staff of the CBG have shown that concentrations in the city of Kamsar, can reach levels up to 60% higher than the SFI's criteria for a period of 24 hours. The atmosphere of Kamsar is therefore still loaded with fine particles from various sources other than CBG such as traffic (roads), burning, and other industrial or commercial operations. The low percentage of aluminum measured in collected dust samples corroborated this fact (about 2% while CBG's ore contains more than 48%). The contribution of CBG in the concentrations obtained in the background studies would therefore be less than 10%.

The results obtained from the modeling of particulate matter emissions from CBG show that concentrations are below the HSE engineering criteria of the Project at the limits of the industrial area for the current operation phase and 27.5 MTPA. The modeling even demonstrates a reduction in emissions due to the addition of equipment using better technology and the new planned configuration for example the unloading of wagons.

The results obtained from the modeling of gaseous emissions originating from CBG show that concentrations are likely to exceed the HSE engineering criteria of the Project at the limits of the industrial area for the operation stage, 27.5 MTPA for short durations exposures.

As part of existing operations, modeling does not expect exceedances of HSE criteria of the Project at the limits of the industrial area. By cons, for phase 27.5 MTPA, exceedances are reported for periods of very short duration (10 minutes). Such periods are mainly due to adverse weather conditions.

goes without saying that the means put in place as part of the greenhouse gas emission control program will also help control the emission of combustion gas.

To validate these claims, a gaseous emissions monitoring program will be implemented during the design and implementation phase to document the concentrations in real time and feed the development of a contingency plan in case of overrun.

**Table 4.1 WHO Guideline on Air Quality**

Aggressor	Average Exposure Time	Target	value mg/m <sup>3</sup>
PM <sub>2.5</sub>	1 year	1st intermediate target	0,035
		2nd interim target	0,025
		3rd interim target	0,015
		Guideline	0,01
	24 hours	1st intermediate target	0,075
		2nd interim target	0,05
		3rd interim target	0,0375
		Guideline	0,025
PM <sub>10</sub>	1 year	1st intermediate target	0,07
		2nd interim target	0,05
		3rd interim target	0,03
		Guideline	0,02
	24 hours	1st intermediate target	0,15
		2nd interim target	0,1
		3rd interim target	0,075
		Guideline	0,05
SO <sub>2</sub>	24 hours	1st intermediate target	0,125
		2nd interim target	0,05
		Guideline	0,02
NO <sub>2</sub>	10 minutes	Guideline	0,5
	1 year	Guideline	0,04
	1 hour	Guideline	0,2

Source: IFC, Environmental, Health and Safety guidelines (EHS), p.6.

#### Mining area

The assessment of dust concentrations in the mining area was achieved primarily through modeling. That covers the different scenarios of production such as current operations, 18.5 MTPA to 2022, 22.5 MTPA to 2022, then 27.5 MTPA from 2022, until 2027.

The HSE criteria of the project are expected to be exceeded in some sensitive points for the annual production rate of 22.5 MTPA and 27.5 MTPA.

For phase 22.5 MTPA, the village of Hamdallaye and the crossroads of Parawol will be impacted. These two points are located between 50 and 100 meters from the road intended for the transport of bauxite. For phase 27.5 MTPA, 7 sensitive points will be impacted and correspond to the following locations:

- Pomboniwol
- Sintiourou Nalbewou
- Boullere
- Daara
- Kourawel
- Sintiourou Kourawel
- Hamdallaye

These points are located between 50 and 1000 meters of the roads planned for the transport of bauxite.

The highest concentrations of particulate matter are observed near roads and storage areas. By moving away from these areas, concentrations decrease rather quickly. For example, the circumferential line of exceedance of the HSE criteria for stage 27.5 MTPA becomes blurred at about 1 to 2 km of the planned roads.

Some mitigation and additional control means are recommended by CBG to reduce the impact of dust on communities. The first objective is of course reduction at the source.

A preliminary assessment of certain mitigation measures was conducted by SENES, a subcontractor of EEM. The use of higher-capacity trucks as suggested would reduce by about 40% particulate matter on roads. The control of the speed of engines will reduce by about 9% on roads near villages and road paving in very sensitive areas, by 90%. CBG is confident to mitigate and control the impacts related to emissions of particulate matter as part of its operations.

All production models do not expect any overrun of the project HSE criteria for SO<sub>2</sub> regardless of the production rate (18.5 MTPA, 22.5 MTPA, 27.5 MTPA). NO<sub>2</sub> level exceedances are expected in the areas adjacent to blasting operations over short durations. Measures will be put in place as part of operations to contain the area affected by these emissions.

#### **4.1.2. Greenhouse gas**

The production expansion project will ensure increased local GHG emissions. This increase is, however, not directly proportional to the increased production since by carrying out the extension, we improve the effectiveness and efficiency of the process.

To reduce the impact of increased production on the emission of greenhouse gas, CBG has engaged in various fuel consumption reduction actions (section 4.2).

#### **4.1.3. Noise and vibrations**

##### Kamsar

Noise modeling was carried out as part of the ESIA. By comparing the projected values with the results obtained in the sampling carried out by the CBG team, it turns out that most of the measured results are higher than the values obtained as part of the modeling. This is mainly due to traffic noise which is added to the noise generated by the operations of the CBG.



Projected noise levels for the current operations at the limits of the industrial area meet the HSE criteria for residential areas (IFC). The modeling shows that the levels projected for the various phases of extension (18.5, 22.5, and 27.5 MTPA) do not increase significantly (<3 dBA).

No attenuation means are formally recommended for Kamsar area. Best practices will be applied as part of the extension project as a principle of precaution.

#### Sangaredi

According to the results obtained during the modeling of the sound environment it appears that the project HSE criteria would be exceeded in production phase near several villages.

The Project will use attenuation means minimizing the impact of increased noise levels in surrounding communities.

One of the means proposed is to revegetate, where necessary, a minimum area of 100 meters between operations and homes. We therefore recommend the use of the buffer zone prescribed by the Mining Code to that end. A plantation of dense vegetation can reduce noise levels to 10 dBA (between 3 and 10 dBA according to the dominant frequencies). The construction of fill slope at the limits of mining plateaus before the beginning of exploitation of new quarries can reduce about 2 additional dBA.

For sensitive areas already known such as Hamdallaye or Kourawel, it is planned to eventually relocate communities since these villages will be impacted not only by the sound but also by the influence of the land. In other villages, like Fassaly FoutaBeh, mitigation measures will be included in the Resettlement action plan (RAP).

In parallel to mitigation means envisaged to be implemented by CBG, studies will be commissioned to reduce sound levels at source on mining equipment. Noise abatement projects with impressive results have already been achieved on mining machinery of large size. So it would prove interesting, given the problems connected to the sound environment, to mandate an expert consultant to conduct a feasibility assessment. There are rarely standard means provided by the manufacturer and that requires strong expertise to develop appropriate solutions. It might be possible to reduce sound levels at source by 10 dBA in some cases. Noise reduction will be evaluated case by case, depending of the impact level. Mitigation actions will be implemented by escalation until we reach an acceptable noise level.

#### **4.1.4. Water quality and sediments**

##### Surface water

Current operations are such that runoff waters from the mining areas and operations are redirected to irrigation canals leading to settling ponds. Runoff waters are filtered by infiltration into the ground or in the mining front. No runoff water goes directly into a watercourse.

Runoff waters at the plant in Kamsar are directed through channels to the outside of the industrial site. At the exit of the effluents, an oil separation system is present to prevent accidental contamination.

##### Groundwater

In Kamsar, impact sources are linked to the construction of new facilities at the port and at the factory in Kamsar, especially the drying associated with the construction of the new tumbler.

### Wastewater

CBG operates as part of its regular operations, a wastewater treatment plant in Kamsar and Sangarédi. The one in Kamsar is equipped with a bacteria control system by UV treatment. It is planned to improve the station of Sangarédi with the same equipment.

### Water quality monitoring plan

A periodic monitoring of groundwater quality in the mining area is already in place to assess the impact of mining activities of CBG on the region's surface water. This program will be improved as part of the expansion project.

A sampling program of groundwater will be developed using recognized techniques and methods. Drilling will be conducted at strategic points to monitor the quality of groundwater in the mining area, and also in the two waste disposal sites (Bendougou & Tora Bora), in Kamsar.

The monitoring of wastewater discharges (effluents) of the industrial site Kamsar currently carried out by CBG will continue to enable identification of potential contamination of surface water, among other through the industrial activities of CBG in Kamsar.

## **4.1.5. Miscellaneous (soil management, waste and hazardous substances)**

CBG is managing contaminated soil, residual material, and waste with procedure CBG\_HSEC\_PRO\_4010: Waste management.

### Soils

All sectors will be autonomous and leak detection and recovery systems will be in place and all spills will be recovered for reuse or treated.

All spills outside the treatment areas will be cleaned quickly. CBG has begun construction of a treatment area of contaminated soils through bioremediation.

### Residual materials

The waste management plan will promote the adoption of practices based on the 4R, ie, favor the reduction, reuse, recycling and recovery of waste. By minimizing disposal, the environmental footprint of the project will thus be reduced. Specific waste management plans will be developed for each phase of the project.

Residual materials management will require monitoring of quantities generated. To this end, targets will be set for recycling and recovery rates that will be the two main objectives associated with this issue. We will also add an indicator to measure the amount of waste generated per person-day on the site in order to be able to validate the absolute reduction in the amount generated.

The plan will also address issues related to the handling and storage of oil and chemicals, prevention and intervention measures in case of spills and transportation of hazardous materials. It will cover all departments, throughout all phases of the project.

### Ordinary waste (household, industrial non-hazardous)

The volume of waste transported at Bendougou discharge for 2013 is 18 000 m3. No statistics exist on the distribution of such waste. A portion is recovered, recycled or reused by the employees and the population for various utilities. It is difficult to quantify the exact amount of waste generated as part of operations.

Wood is recovered as building materials and for cooking or smoking fish. Cardboard is used as fuel for cooking.

### Special wastes (eg. Biomedical, waste oil, batteries)

As part of its current operations, CBG has established special waste recovery procedures.

#### Batteries

A procedure exists to ensure the recovery, storage and disposal of used batteries of light and heavy machinery, locomotives of Kamsar and Sangarédi.

The method is to drain the batteries of their acid and store them in a place arranged and specified (what is done with the recovered acid). A monthly report is provided to the environmental service of CBG containing the amount, type and origin of batteries provided.

#### Used oils

In order to comply with its environmental policy, CBG has established appropriate methods of handling, draining, transport storage and elimination of used oils (instructions).

It covers all of the collection, transportation, recycling and quality monitoring by chemical analysis of used oils. As part its normal operations, CBG has set revalorisation goals. For 2013, the goal of recovery was 200 000 liters of oil, 109 600 liters were recovered. 97% of recovered oils are intended for drying ovens, while 3% are reused by Nitrokémine.

Draining and collecting oil from mining machinery are carried in storage tanks positioned at Sangarédi. Necessary measures are taken to prevent spills and used oils leakage during the maintenance of equipment. Any incident is reported directly to the immediate hierarchy.

The transport of used oils is planned by making a request to the head of the rail yard (FBC) of N'Dangara (Sangarédi) to ensure the boarding and transport by train of used oils containers to Kamsar. The unloading of tanks in Kamsar is carried out at the heavy fuel oil pumping station (HFO) by draining the tanks in sumps of the pumping station. Finally, used oils are reintroduced into the process, in the drying ovens for bauxite, as a fossil fuel.

A team ensures sampling and periodic analysis of wastewater effluent samples. The analysis report is communicated to the services concerned (CBG workshops and environment) and monthly statistics of used oils recovered in CBG's facilities are provided.

A record of non-conformities reports related to oil management is documented and an analysis is carried out annually.

#### Biomedical Wastes

There is a biomedical wastes management procedure. The objective of this procedure is to collect, incinerate and bury the ashes of biomedical wastes of the hospital of Kamsar (ANAIM), CBG dispensaries and the infirmary in the mining area.

There are 3 levels of responsibility in the management of biomedical wastes. Biomedical wastes generator services are responsible for the collection, storage, conservation in suitable containers and their transport to the place of incineration and keeps track.

Incineration services of biomedical waste in Kamsar and Sangarédi are responsible for the incineration of biomedical wastes delivered to them in accordance with the health requirements of humans and the environment.

CBG's environmental service ensures, meanwhile, the environmental audit on the management of biomedical wastes, compiles data on waste and ensures the review of the management of biomedical wastes procedure.

To allow the implementation of this procedure, officials of the services concerned should develop other appropriate work instructions or appropriate working methods of handling that take into account the specificities of their sectors.

#### Hazardous Materials

CBG applies a hazardous materials management procedure used to work and to which workers may be exposed. There is also a communications program to inform employees, subcontractors, service providers, clients and the community on the dangers related to the use of these products. This program meets the regulatory requirements in terms of SIMDUT in Guinea and Alcoa standards.

This program applies to all employees, contractors, service providers and customers and the community exposed to hazardous materials purchased, used, handled by CBG or because of CBG.

#### **4.1.6. Biodiversity**

As stipulated in the ESIA, the detailed discussion of the role of biodiversity in the legislative and normative framework of Guinea (section 4.2.1) clearly illustrates the importance placed by Guinea on biodiversity.

Given the importance that the Republic of Guinea gives to biodiversity, demonstrated in its laws, its action plans and the international conventions it has ratified, CBG reiterates its adherence to the principles and recommendations of these texts and makes the commitment to remind them to its employees and subcontractors.

Given the presence of many important species for conservation and habitat in critical areas of studies, discovered during the ESIA, and that could be affected by the expansion project, CBG is committed to take attenuating actions required by applicable Guinean and international texts and by the SFI standards for their protection (PS6). All employees and contractors will be informed of the biological importance of the sites, specific actions on the ground, and defended actions.

#### Objectives and Targets

Specific measures aim to achieve net earnings of biological wealth where habitats have been designated. The targets were set in line with the biodiversity values identified during the ESIA, which are based to reduce negative impacts and enhance the positive effects of the project activities on biodiversity.

The measures to be taken concerning the physical environment having a possible impact on the biological environment are mentioned in section 2 of this document and are not repeated in this section.

#### Action Plan for biodiversity

The SFI Standard 6 specifies measures to be taken in the event that the Project would impact the natural or critical habitats. These measures will be included in the Biodiversity action plan in progress, key pieces of our environmental and social management system. These actions will create a mechanism through which will be achieved the objectives and goals for biodiversity conservation within the area impacted by the project. A summary of actions is available in this ESMP. The BAP will demonstrate the process, which is intended to lead to PS6 compliance.

The project will adopt an action plan to ensure no net loss of biodiversity. Actions can be divided into several chapters and are likely to protect all components of the ecological systems of the study areas, even species whose presence has not yet been identified:

- Access control to the important biodiversity areas;
- Management of important biological species;
- Delineation of critical habitats to prevent the inadvertent destruction through ignorance or negligence;
- Checks on how to remove vegetation;
- Managing weeds;
- Community uses of biodiversity and other ecosystem services;
- Research and Development Program;
- Restoration of vegetation;
- Potential Compensation measures (eg restoration of gallery forest corridors and participation in a conservation program); and
- Research on aspects of the wider vicinity of the mine (cumulative impacts and regional management).

This BAP obviously includes in addition to CBG, local stakeholders including residents and nearby villages. It also includes the participation of biologists, agronomists and competent sociologists familiar with the local situation. It will be important to explain the why and how of the plan to residents. Without the support of the local population, the plan will not be effective. Finally, it includes a timetable and a list of officials and participants.

#### **4.1.7. Social and Demographic Structure**

The role played by CBG in shaping the socio-economic situation of the study area is very important, especially in the Sangarédi region. Given this importance, so we expect that the project will potentially be associated with migration issues and issues related to social and family structures.

Several factors can influence the social structure and demography. As part of the ESIA, impacts have been considered mainly through migration induced or accentuated by the development of the Project.

As presented in the chapter impact assessment of the ESIA, two main factors may explain migration flows likely to be generated by the Project.

Areas where CBG expects to realize the Project mining bauxite are generally agricultural or livestock areas. The most affected villages will be dispossessed. These people risk being forced to leave their village to join either a host village in search of new lands or the city in the hope of finding new sources of income.

The issues related to employment and the hiring of new staff potentially will attract people in the villages of the area, but also other cities, other regions see other neighboring country toward Kamsar and Sangarédi. The flow of population to the cities, the change of economic direction and the arrival of foreigners will impact issues related to social and family dynamics, mainly in the mine area. CBG commit to develop an influx management plan.

#### **4.1.8. Safety and health of communities**

The increase in CBG activities can increase the risk and health impacts that neighboring communities are exposed to. This chapter has specific mitigation measures that CBG intends to put forward to prevent or minimize the risks and effects on health and safety that may arise from project activities.

The following international guidelines have guided the approach to the assessment of risks to health, safety and security of communities:

- Performance Standard 4 of the SFI: Health, safety and security of communities;
- General EHS Guidelines of the SFI;
- Guinean Mining Code: Chapter VII - Health Development.

Performance Standard 4 of the SFI requires that an assessment of risks and impacts on health and safety faced by affected communities is completed and the prevention and control measures consistent with good manufacturing practices are identified.

CBG extension project must also comply with Chapter VII of the Mining Code (2011) and the Environmental Code and with international best practices (Article 142). Appropriate techniques and methods should be used to protect the environment, the safety of workers and the local population in accordance with the Environmental Code and with international best practices "(Article 142).

##### Pedestrian and Road traffic

Intensified CBG activities lead to increased local traffic on national roads as much as on the village roads. This additional traffic will increase the risk of traffic accident especially with an expected population increase; the number of pedestrians will also increase.

An increasing number of mining machinery will also have a considerable impact in the operating area surrounding the quarries and mining tracks. By cons, these places are forbidden to people non authorised by CBG.

CBG is committed according to Performance Standard No. 4 of the SFI to improve road safety conditions in its scope of intervention by implementing measures as described in section 4.2.

##### Port facilities

The increase in ships passing frequency may be associated with an increased risk of accidents in the channel. Doubling the number of ships passing will lead to greater risks for fishermen or other ship sailing into port.

Outreach activities with the port authorities and the population of fishermen who sail in the channel will be required to inform on the progress of work (dredging, lengthening the loading dock, etc.).

Traffic shuttle dedicated to monitoring will increase at the time of specific work to prevent accidents.

##### Railway

Train passages have impact on the villages life settled along the railway and represents a major concern for the population. From an average of 10 runs per day, the project will increase to over 18 passages per day (27.5 MTPA).

Between Kamsar and Sangaredi, the railway runs through several villages such as Kamakouloun. In other places, residents must cross the track to reach certain places, such as a school or cropland.

The amenities of the tracks can also serve as a traffic corridor for taxi-motorbikes (parallel paths).

CBG is committed, as part of its project and its operations, to continue its efforts to raise awareness of the local population vis-à-vis the risks connected with train crossings. Some measures to improve the signage are provided in the extension project from phase 22.5 MTPA, including the installation of level crossings, security gates at PK31, PK37 and PK77, level crossings lighting, the tags embedded system and railway signaling using the "Communication-Based Train Control" technology (CBTC) will help to mitigate risks. The construction of a bridge for the national road is also planned to ensure the passage of the train to Parawi plateaus without obstructing traffic.

Finally, the project related to railway safety is underway in the region, where we are installing a fence to control the crossings (Kamsar).

#### Security around quarries

The presence of village near quarries exploited by CBG presents a major challenge in terms of security. The measures to be implemented must take account of cohabitation and special attention must be paid, among other to road safety.

#### Exposure of workers and communities to disease

An evaluation report on the risks to human health has been prepared as part of the ESIA. This study is based on the latest available toxicological information and the most relevant studies for exposure to SO<sub>2</sub>, NO<sub>2</sub>, particulate matter and noise, among others.

The general objective of this study is to identify, to relate the different health risks generated by CBG and assess their impacts on environmental health. This assessment is a tool for:

- Establishing the database;
- Informing in full transparency the communities on the contribution of CBG to total emissions;
- Establishing an organization and means to implement the necessary mitigation and control measures.

This study has identified mitigation measures that were included in this chapter. It did not seem appropriate to repeat the other measures included in Chapter 2 - Management of impacts related to the physical environment.

#### Plan of emergency measures

The plan of emergency measures of CBG, as presented in Annex IV, is primarily intended to eliminate, reduce and / or mitigate environmental impacts in the event of hazardous material spills on the site facilities of CBG or around them. It is designed to allow quick and effective response in emergency situations can occur at CBG. This contingency plan applies to all activities of CBG Kamsar. The plan also covers accidents beyond the site, but which are directly related to the operations of the CBG.

For the purposes of this document, an emergency situation includes an actual or imminent event that may affect human life, health, property and the environment.

The plan for environmental emergency measures of CBG focuses on the following aspects:

- The expected significant emergencies (fires, explosions, spills of hazardous materials, toxic gases);
- The organizations called upon to intervene in an emergency;
- The responsibilities and roles of the involved agencies (eg Central Command Post, emergency response team, etc.).

#### **4.1.9. Basic infrastructure and services**

CBG is pervasive in the provision of social services through the provision of water and electricity in Kamsar, Boke and Sangarédi; it has also built (or contributed to the construction) of most of the social infrastructure (schools, health posts, ANAIM hospita of Kamsar, etc.).

We notes however that in Kamsar and Sangarédi particularly:

- Water supply is faulty and causes discontent of the people, for lack of a service provider and an effective system for collecting due payments;
- The distribution of electricity is a major problem, for lack of a service provider and an effective system for collecting due payments;
- Health and education infrastructure are used improperly for lack of staff. They are poorly maintained for lack of appropriate management.

It is dangerous for the operations of CBG to continue to replace the State. It can not have the role of providing such services. However, it can contribute to their financing in a coherent framework of social participation fees and charges, if any compensation or for philanthropic purposes. But a mining company can not acquire comprehensive skills in social management and supply of water and energy for the benefit of the people. The State must restore its role as regulator and service provider, and ensure the proper use of the payments made by CBG.

It is also important to note that the Communes should play a leading role in this area and can not also ask CBG to replace them otherwise their functioning and legitimacy are questioned. The dialogue on taxes and fee will raise the problem of their financing.

It belongs to CBG to open a dialogue with the government on this point, and develop a participatory strategy for the implementation of these social actions which also put the Communes to account.

#### **4.1.10. Economic environment and household strategy**

As demonstrated in the context of basic education, the towns Sangarédi and Kamsar grew with the arrival of CBG. The local economy still remains structured around agricultural activities, livestock and fishery resources for a majority of population.

In the region of Sangarédi, in rural areas, the increase in the area exploited by CBG and the corresponding loss of crop and grazing land is the main impact. This will affect both farmers and ranchers. The possible isolation of some villages through the construction of new tracks or the development of new mining areas is also a risk.

Along the railway, the more frequent passage of trains and adding additional cars is a potential nuisance that could also contribute to blocking channels of communication used for transit trade.

In the urban area of Sangarédi, the prospect of additional jobs is likely to cause an influx of people seeking employment.

In the urban area of Kamsar, potential new direct jobs represent a positive impact for both the construction period and for the future operation. By cons, CBG must properly assess the impact of the influx of people who could be fast and massive, which could prove difficult to be absorbed by the municipalities, the town hall and basic services. A migration management plan is being developed.

Finally, the extension of the dock, the dredging, increased marine traffic, will certainly have an impact on fishing, an economic activity of prime importance for the Kamsar area. The reduction of fishing output could result, for example, the inflation in the price of fish. This could also affect the customary activities in agricultural crops on mangroves and freshwater rice fields in the higher areas.



The impacts of dredging and construction will be the largest in the construction phase than in the phase of operation. We are talking about shorter-term impact. For cons, the impacts associated with the increased traffic will continue.

#### **4.1.11. Access to land, resettlement and compensation**

The expansion of operational areas at the mine, construction of sidings on the railway and the construction of new housing in Kamsar will result in loss of property, land or livelihood for populations inhabiting the area. CBG aims to manage these impacts by the implementation of Resettlement action plans (RAP) conform to the performance standards of the International Finance Corporation (IFC) (notably Performance Standard 5), to the operational directive 4.3 of the World Bank and to the Guinean laws on involuntary resettlement.

CBG has already commissioned a firm to develop the approach and general resettlement compensation. It should be noted that a key element of the approach advocated by the CBG is developing its capacity to take hold, gradually, of the development and implementation of a coherent strategy for the resettlement of people affected by its operations, processing and transportation of bauxite. It is therefore aimed that CBG gradually acquires a mastery of the resettlement process in the years to come.

The main objective of RAP is to provide a clear description and analysis of local and regional social and economic context, the legal framework in which the project evolves and propose a suitable method and a strategy to compensate and resettle the people affected by the project when necessary. The RAP that will be proposed will comply with IFC standards and especially the Performance Standard 5, which relates to land acquisition and involuntary resettlement. Specifically, RAP's objectives will be to:

- To define a clear strategy for the resettlement of persons affected physically and / or economically;
- To have a detailed analysis of national and international legal framework;
- To develop a land matrix and eligibility;
- To establish an evaluation grid, a strategy for the calculation of losses and compensation;
- To describe in detail the stages of implementation of the RAP;
- To develop specific tools for data collection and mapping;
- To provide for specific measures for physical displacement;
- To propose an institutional framework developed in consultation with key stakeholders based on the stakeholder engagement plan;
- To define projects to restore livelihoods;
- To propose a monitoring and evaluation program;
- To elaborate a precise mechanism of grievance;
- To propose a budget and a related timetable;
- Train employees of CBG so that they take charge of the subsequent phases of implementation of the RAP.

The RAP document will be consistent with national standards and the IFC Performance Standards. It will include the following:

- A description of the project and efforts to minimize the displacement of populations;
- An approach for the identification, socio-economic profile, inventories and their updates, the categories of anticipated impacts and affected persons;
- An analysis of the legal framework (including customary rights and overlapping rights to land tenure) and an eligibility matrix;

- An approach to resettlement and compensation, including the assessment of loss, type of compensation, the presentation and signing of netting contracts and selection of replacement land;
- A methodology for implementation of the RAP (including a step of sequencing);
- Specific measures for the physical displacement;
- An institutional arrangement;
- A monitoring and evaluation process;
- A grievance mechanism;
- A budget estimate and timeline;
- A simple user guide for the implementation of the RAP.

The RAP also include the following annexes:

- A land use report including case studies and overall description;
- An evaluation of market-price ratio (typology of land and prices, prices of crops and housing etc.);
- A price database easily modifiable property, with all equivalences measurement units at market prices; a guide for using the database ;
- All data collection tools and mapping tools (including land tenure) with a manual;
- A grid of indicators for monitoring and evaluation;
- One or model (s) for the different types of contract and / or micro projects.

Note that the RAP must be endorsed first by the affected communities, and subsequently approved by local authorities (Government of Guinea) and international ones (IFC) before its implementation.

### **Approach**

Before going ahead with the drafting of a RAP, it is important to determine the context in which it will intervene. We must take into account the detailed description of the project components that require the displacement of people or causing loss of lands or livelihoods. These areas will be identified and mapped in detail

The legal framework for resettlement will be developed taking into account international standards, Guinean law, the mining convention, land tenure and local practices. Differences between local law and international standards will also be identified.

In this way, the requirements in the development and implementation of a RAP will be proposed. The preferred option will be detailed and substantiated.

### Consultation and participation

The stakeholder engagement plan (SEP) developed as part of the Environmental and Social Impact Assessment will be adapted to the issues of consultation and participation of a RAP. The modified SEP identify aspects of consultation and participation of the RAP and provide a structured approach to stakeholder engagement throughout the relocation project, involving, among others, the following topics:

- The participation of key stakeholders and departments of CBG;
- The development of a prefectural committee involving the technical services of the prefecture, notably the Land Commission. Members will be appointed. The committee will monitor notably the approach and validation stages of the RAP with government authorities.

- The development of advisory committees in villages. These committees involve notably CBG and representatives of affected communities. It is proposed that the members of these committees are from political and traditional authorities, but that are also found representatives of women, youth, minorities and various lineages and ethnic groups. It is suggested that the selection of members is done democratically; each member is elected at a plenary meeting with the communities and people affected by the project. At this stage, these committees serve as an interface for consultation and validation stages of the RAP with communities. The specific roles and responsibilities of the committee remain to be defined:
  - The committee will be the cornerstone of consultation and participation activities for all activities of resettlement and compensation. It will in particular define a process of information dissemination, validate all planned steps and develop partnerships for the restoration of livelihoods;
- Consultation with project affected individuals (PAP) in the planning of resettlement activities and the selection of resettlement sites;
- Consultation with PAP on the types and levels of compensation;
- Consultation with people already living in the resettlement areas;
- PAP involvement in the activities of implementation and monitoring of the RAP;
- The information dissemination process relating to all stages of the project (planning, implementation, monitoring and evaluation of activities of resettlement and compensation and restoration of livelihoods);
- The involvement of vulnerable groups (the poor, women, those without bound on land, etc.);
- Using data management software for documentation and analysis of consultation and participation activities.

As part of the drafting of the RAP, CBG provides three activities to involve stakeholders from the beginning to the end of the process:

- A workshop with stakeholders (CBG, authorities, PAPs) early in the development of the RAP to discuss concerns and expectations of each and validate at a high level the approach to compensation and resettlement, including for restoration of livelihoods.
- A validation workshop of the RAP is also offered during the restitution of the Environmental and Social Impact Assessment.

Ongoing communication throughout the development of the RAP with stakeholders will ensure an ongoing dialogue with them. The RAP's restitution to the PAPs after approval by national and international authorities is also planned. The grievance mechanism developed as part of the SEP prepared for the ESIA will be adapted and used for the settlement of disputes.

#### Resettlement and compensation strategy

Once the need for resettlement and / or compensation is clearly identified, the first step will be to proceed to the identification, the detailed identification of the socio-economic profile and the realization of inventories.

A description of the identification process of PAP and communities and property and land, the development of socio-economic profile and the mapping of territorial occupation in the project expansion area will be provided.

The project area is evolving in a specific context where the regime of land rights does not always correspond to modern law or customary law, while sometimes the two overlap. The study of traditional land tenure rules and the basic socio-economic context will enable the establishment of an eligibility matrix. This matrix will specify the options in terms of pay by social status, tenure and type of land or property of those affected. Individual and collective compensation will be considered.

A specific market study will provide an update of all current price of goods, assets, crops, housing and land compensable. A method will be developed to estimate the value of losses. It will take into account the volume of transactions and prices in areas to move. This study will include:

- An update of what has already been compensated and the sustainability of the procedure used;
- The transaction price of different types of land at an average cost per hectare;
- Assessment of the agricultural part (annual and plantations) from a thorough knowledge of the life cycle of each type of crop and prices in the local market;
- For each regional market, an inventory of the price of each product expressed in the local unit. The price of each product expressed in international and local mass units will also be established. This price matrix will give the ability to develop a database with all the information needed to calculate the cost of compensation and opportunity. It will also give the opportunity to follow the evolution of prices in the future;
- For each area covered by resettlement, an estimate of the current cost of construction of houses. Scales will be developed to estimate the replacement cost of houses according to several criteria (eg materials, labor, transport, etc.);
- A consideration of currency fluctuations to provide a calculation to compensate for inflation.

According to the eligibility matrix, will be described how each type of PAP will be compensated and what measures will be needed to carry out effectively the compensation in money, in kind (including land and infrastructure, especially housing) or by setting implementation of micro-projects (for collective compensations and restoration of livelihoods). The methodology will propose a compensation package that will be combined with the type of land the type of land rights and the right of those affected. More specifically, the strategy must present the process to determine:

- The setting of a deadline for compensation and relocation;
- Identification of land and occupation;
- Identification of land rights of the affected RAPs;
- The estimation of losses caused by the project;
- Selecting the type of compensation to offer to those affected and the terms of contracts;
- The implementation of micro-projects for the restoration of livelihoods;
- The compensation in cash or kind;
- The effective replacement of land by another land or housing by another housing;
- The finalization of the process.

The overall strategy should include provisions to avoid another return on the relocation areas. The deadline and the rights associated with the compensation matrix should be designed accordingly.

#### *Specific measures for physical displacement*

The physical displacement of the population is much more difficult to implement than economic displacement. It must provide for replacement land and housing, and the evaluation of the total cost of such replacement.

Resettlement must be based on the development of a master plan. The master plan will be developed with local and traditional authorities. Its content will take into consideration the following:

- Infrastructure (eg road access, water supply services.);
- Distance constraints;
- Family reunification or individuals;
- Economic and social dynamics;
- Liaison with the authorities;
- Improved quality of life of PAP compared to the initial situation.

#### Restoration strategy of livelihoods

The extension project will have impacts on the livelihoods of affected communities, including the loss of farmland and pasture and woodland.

It is proposed to hold workshops with stakeholders (CBG, authorities, PAPs) early in the development of the RAP and then gradually as the work progresses. These workshops will address particular stakeholders expectations vis-à-vis the compensation and resettlement policies, but also the solutions each expected by each party for the restoration of livelihoods and the way forward for the implementation envisaged by all. Thereafter, they will validate the options and come to a consensual choice, including the choice and location of agricultural land replacement.

#### Selection of resettlement land

In a relocation process, it is necessary to plan the development of resettlement areas. It consists of consultations with all local stakeholders (technical services sub-prefectures and prefectural services, Municipalities (decentralization), traditional authorities, etc.) and visits to each of the localities concerned for the delimitation of areas reserved for relocation.

The objective is to identify, to map and manage the evolution of the habitat, taking into account the resettlement and demographic expansion. In detail, it is:

- to assess the main risks of relocation and mitigate the consequences on the community as a whole (space consumption, access to resources (water, wood, erosion, etc.);
- to delineate the areas for relocation, either houses or housing estates or the related infrastructure (transport links, no water supply, public services, etc.);
- to establish a Community infrastructure equipment plan to strengthen the land allocation process;
- to map the agricultural land in order to fully assess alternative lands.

The approach is participatory and consultative with all stakeholders: displaced populations, potential resettlement areas (if any), the services of the deconcentrated and decentralized State.

A first introductory workshop of the project and relocation process and its consequences (travel, relocations, installations, management and benefits) for the support of all and to avoid in the future sabotage of facilities and resettlement claims of opportunistic residents. A working group will be created to track the zoning exercise.

This group will be responsible for:

- Delimiting the areas concerned and selected areas within the process;
- Choosing the best relocation options (from a social and technical point of view);
- Informing the populations concerned about the process.

A final restitution to affected communities will be organized to present the final plan and discuss the resettlement process to be held, (a necessary step before any operation). After zoning, community and CBG will have agreed on:

- A land management plan that will allow the harmonious development of resettlement areas. This plan will be used for the Resettlement action plan as a reference for displacement of the affected households.
- This plan will include a zoning indicating clearly the areas designated for residential purposes, for economic reasons (market, agricultural or livestock areas, crafts, etc.) for public infrastructure (health, education, drinking water, sanitation, etc.) cultural (sport, leisure, etc.), etc.

It should be noted that the zoning work during production of the the RAP will be possible only if we know the areas to relocate and fiscal adjustment may be necessary depending on the scale of relocations.

#### *The institutional framework*

The roles and responsibilities of all stakeholders as part of the RAP will be described. Special committees will be established for the effective involvement of the administration (especially the "Land Commission") to validate the different steps and actions of the implementation of the RAP (see 1.3.2 Consultation and participation). This institutional framework will rely on the SEP and will be based on the experience gained in the region.

Existing mechanisms will be analyzed and adaptation will be proposed to ensure the sustainability of the process of resettlement and compensation.

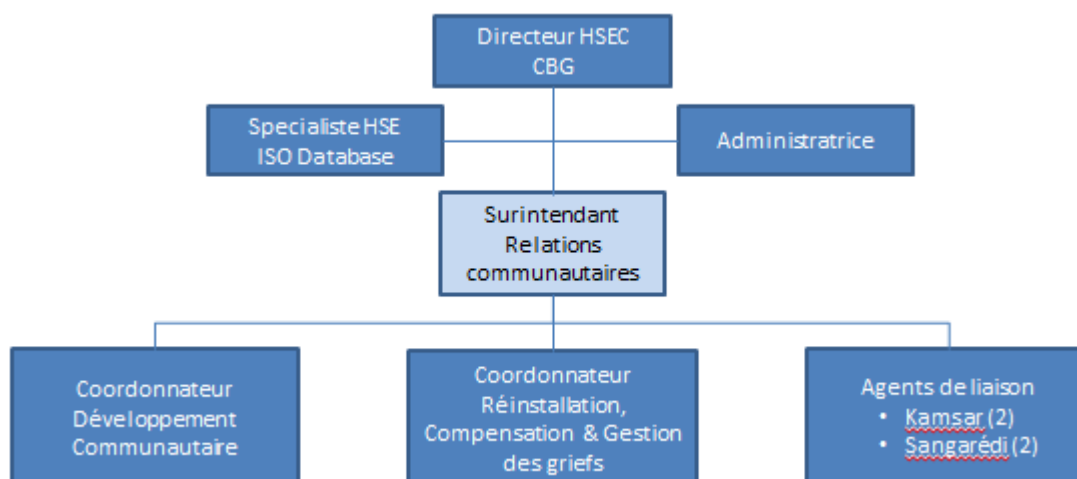
#### *Estimating a budget*

From the data of the socio-economic background study and from those of the compensation matrix, an overall indicative budget will be estimated using the technical options of the project.

#### *Resettlement Unit*

The institutional set up of the implementation developed, as part of the RAP of the Extension Project will establish the creation of a resettlement unit at CBG with a leading role in the resettlement of people affected by the expansion of activities of extraction of bauxite and future advanced mining operations.

CBG is committed, following the recommendations made in the stakeholder engagement plan in a process of strengthening its teams. A Community Relations section has been created and placed under the direction of the Director of HSEC.



**Figure 4.1 Structure of the Community Relations Section**

This team will be joined by members of all departments involved (eg departments of engineering, communication, etc.) to establish a resettlement unit for each of the RAP.

As part of the expansion project, CBG will be called to take over the resettlement strategy. The cell members will receive specific training and personalized support based on the the RAP Project. The training will include resettlement strategy, and will include an overview of the Equator Principles and Performance Standards IFC, key steps, tools and roles of various stakeholders in CBG and externally. A simple user guide for the implementation of the RAP will also be developed. Two training series are planned: the first at the beginning of the RAP drafting phase and another following the approval of the RAP by national and international authorities.

The successful consultant will be in charge of conducting consultation workshops throughout the phase with the support of the resettlement unit of CBG. The consultant will accompany the resettlement cell CBG throughout the phase to build capacity.

In subsequent phases, it is expected that the relocation unit of CBG take the mastery of the RAP's activities under the direction of the Superintendent of Community Relations with external support as necessary.

#### Implementation of the RAP

From the basis of data produced, the cost of land, crops, infrastructure, or other types of goods will be affected was calculated. The compensation to each affected PAP will be presented and approved by authorized persons. The compensation in kind, in cash or in micro-project can be combined and lead to a compensation agreement to be signed by each PAP.

Based on the choice of place of resettlement, a master plan will be developed and implemented in consultation with all local stakeholders (technical services sub-prefectures and prefectural services, rural communities, traditional authorities, etc.). The master plan will include compliance with reserved spaces for housing, social services (health and education), supply and wastewater management, tracks and roads identified during the inventory phase.

Regarding collective compensation through micro-projects, a selected executive agency will be in charge of their selection and implementation. The actions supported will be:

- Support for the selection of an executing agency by the definition of terms of reference;
- Support for the executing agency for the selection of micro-projects with the community (note that the identification with the PAP potential micro-projects have already been completed during the course of the inventories in the village);
- A prioritization of needs will be based on the available budget in coordination with existing services in the region (for example, a health center will not be provided if it already exists which is properly equipped and accessible);
- Support for the executing agency for the implementation of a final selection process of the project and the finalization of the tender procedure to ensure transparency. The tendering procedure is the responsibility of the implementing agency;
- The monitoring of the construction or implementation of micro-projects: CBG will ensure that PAPs are fully involved in the process and that projects are implemented in accordance with the provision. Support will be provided to the implementing agency accordingly.

The effective completion of the process will be possible only after the completion of all compensations, including the replacement of land, housing construction and retrocession to those affected. A special act will be drafted accordingly.

The terms of reference will be made to implement an audit process and external evaluation - in addition to the one financial institution funding the project may be implementing.

### **Resettlement and compensation as part of the operation stage**

As part of the operations of the mine, management of loss of land (cropland, fallow land, pasture, etc.) must be ensured in the long term. Background studies and impact analysis showed that three areas will be heavily impacted.

The community relations team will provide for the realization of a minimum of three additional RAP to cover the impacts induced by future advanced mining as described in the mine plan 25 years (27.5 MTPA).

**Table 4.2 Additional RAP necessary for the operation of the mine**

<b>Region</b>	<b>Year of implementation</b>	<b>Heavily impacted villages</b>	<b>Responsible</b>
Parawi	2018	Parawi, Guéguéré	Superintendent Community Relations CBG
Kagnéka	2021	Kagnéka, Horé Lafou	Superintendent Community Relations CBG
Kourawel	2022	Kourawel, Sintiourou Kourawel, Parawol Parawol Aliou, Paragogo, Sinthiourou Kourawel	Superintendent Community Relations CBG

#### **4.1.12. Governance and social cohesion**

Whether by own merits, by funds allocated to the TCA or services via its own operations (electricity, water, maintenance), CBG has contributed and still contributes greatly to community development. Socioeconomic studies showed that although the projects undertaken by CBG represent a positive impact, there still exist some shortcomings or improvements that could be made.



According to public concerns, it appears that CBG should further document and quantify its contribution in the communities affected by its operations in order to demonstrate in full transparency the real contribution versus what is claimed.

The population does not receive the supply of electricity or water as part of a full compensation but requires more funds from CBG for projects related to community development. For example, the majority of the population affected by the operations of the CBG in the mining area does not have electricity or running water directly. If the current strategy remains unchanged, socio-economic impacts of the proposed expansion will be mainly negative for the area. The same phenomenon applies for Kamsar, where the majority of the population have no access to water or electricity.

The challenges of community development are based on four main dimensions:

- The ability to work with the state;
- Openness to increase the amounts paid by CBG for the benefit of community development in the mining area;
- The adoption of a development agreement with local communities;
- Strengthening the team of Community Relations (CBG and the development of a practical partnership with specialized external organizations can complement internal expertise of CBG (eg. Specialized NGOs).

#### Grievance handling mechanism

CBG establishes an alternative mechanism for handling complaints and managing differences based on mediation and arbitration by third parties. This mechanism comprises various stages:

- Reception and registration of the complaint;
- Preliminary review and classification;
- Treatment of the complaint;
- Closure of the complaint.

The different stages of the process of receiving, processing and closing complaints are detailed in the procedure "Grievances management mechanism" (Annex VI).

The complaints mechanism will be publicly announced and explained to the communities in order to ensure that the latter can understand it properly and use it properly. This step is key in the process of accepting approach.

#### **4.1.13. Communication and Information**

##### Internal communication

Certain lines of internal communication should be strengthened between the departments "Community Projects" and "Health Safety Environment" notably. The organizational structure of the HSE cell and Community Projects has been modified to better coordinate its actions with those of the HSEC Management.

The flow of information has also been strengthened between the different components of the project and in particular between the mine and Kamsar and between departments which have direct contact with the population. Antennas were installed at the department of communications and community projects in Sangarédi. The HSE team in Sangarédi has also been strengthened to provide a dedicated service to communities and the environment in this area.

The edition of the common bulletin related to social affairs, communication and the SES department is as such a useful tool that must be maintained and strengthened.

For all staff of CBG and service providers, a social component will be integrated into the home training. It will aim to explain the "standards of conduct" to be followed by employees in their interactions with the population.

#### External Communication

The communication and engagement of stakeholders strategy \_ must differentiate between target levels. Locally, the device is expected to strengthen local communication; at the second level, a framework must be established (or reactivated) to allow the opening of an inter-prefectural or intercommunal dialogue; Finally, at the national level, discussion of global issues should be a specific strategy.

Local communication will be structured around the following device:

- A communications team in Kamsar and in Sangarédi;
- The dissemination of radio and television broadcasts;
- The obligation for providers and subcontractors to integrate the basic messages to their TORs;
- Standards of social respect to comply with in villages by the employees of the CBG and subcontractors; and
- A consultation process and commitment to maintaining continuous, two-way interaction between CBG, communities and local authorities.

It will be accompanied by a consultation framework for open discussion with authorities and technical services:

- A consultation framework bringing together stakeholders on a quarterly basis in Sangarédi, Boke (including the municipalities of Tanéné and Kolaboui) and Kamsar;
- The widest possible dissemination of the internal bulletin of the CBG.

At the national level, and with the involvement of the decentralized services of the State, a dialogue will also be open on the following points:

- The restoration of the role of the state in social services and supply of water and electricity;

A national public information regarding the actual contribution of CBG at this level.

#### Device for local and community communication

Most villages in the concession does not have access to FM radio broadcasts because of the relief. We must therefore develop a different information dissemination strategy that enables CBG to reach and communicate effectively to populations, and populations must also be able to communicate and transmit information directly to the departments concerned of CBG.

#### A team of communication and community relations

A "Community Communication" full-time team will be set up. Its role will be to collect information from various departments of CBG and its service providers, message development and media (content and form). It will work under the direction of the responsible for communication, in collaboration with the radio services.

For the system to work, the agents evolving on the ground, particularly those in contact with the people should consult and enter into continuous relationship with the communities and local traditional and administrative authorities to understand the issues, concerns and be able to pass the information to the communication unit and more generally to the HSEC Department who will then inform the public of the planned activities and adapt their intervention strategy accordingly.

Teams that operate on the ground and that circulate in the villages of the concession helps to forge, within the community, the image they have of CBG. If these people do not respect certain rules of conduct and do not have professional skills, relations between CBG and communities will be tainted. Respect for people by all employees and contractors of CBG must be an obligation. This is the basis of communication and this is essential for establishing (and maintaining) the trust and maintaining healthy relationships between stakeholders.

#### Consultation Framework

Previously there was in Sangarédi a Consultative Committee which met quarterly and brought together CBG, the Commune and decentralized services. The restarting of the framework could help restore the basis for dialogue between stakeholders. Obviously there is the risk that such a committee to become assertive and result in a round trip of application / refusal. To avoid such a situation, the mandate of this committee should be defined on the basis of the Code of communities which sets the respective responsibilities of municipalities and decentralized services, and the Mining Code, and the roles and responsibilities of the various defined parts. This could possibly be formalized in a Memorandum of Understanding signed by all parties.

To foster dialogue on the overall project footprint we can consider forming three consultation frameworks:

- One in Sangarédi together the CR located in the concession (Sangarédi and Daramagnaki): its composition must include representatives of municipalities, representatives of the most affected districts, more decentralized technical services, civil society (representation of the civil society and NGOs such as CECIDE), CBG, providers in contact with the population, the independent media facilitators;
- One in Boke prefecture for all matters relating to the activities of CBG. Ideally it should be the same committee already in charge of monitoring mining activities in the area and the Joint Consultative Committee of the CBG.
- One in Kamsar that bring to the table CBG, the commune, technical services, districts, civil society organizations, TPEs and other service providers, independent media.

Representatives of the communication team should routinely participate in these committees but it is important to consider that executives of the various branches of the company can also participate when the issues raised concern their sector. Such participation will broaden the idea of social responsibility within CBG.

A minimum budget paid for by CBG (or at a shared cost) should be allocated to their organization to ensure the presence of the largest number of representatives. Transparency and broad and continuous diffusion of information are key factors for improving the quality of this dialogue.

The proposal to publicize them, or rather to invite independent media to participate (ensuring they understand the mandate of these committees and limits of exercise) would provide evidence of good faith on the part of CBG and would avoid that information is retained by the only participants. In practice, experience shows that the mechanisms of "rendition" (developed and conducted with the support of the communication team) must be provided to ensure proper dissemination of information and decisions taken by the committee.

Furthermore, and in addition to this framework for dialogue, the widest possible dissemination of the internal bulletin of the CBG will play a more active role with the reading public.

### National public information

The direction of CBG has a communication strategy at the national level that is measured. So that people understand the potential role of a mining project such as that of CBG at the national level it is important that certain information be disseminated more widely, for example:

- Its annual contribution to the state budget;
- Its production targets;
- Its annual contribution to social development in the region;
- The main actions taken by CBG.

If, on the one hand, such communication can have a "marketing" role, it will also situate CBG's role in local development and contribution of the state and communities. By communicating the payments made to the state, the restoration of its role in the Boke prefecture will be favoured.

#### **4.1.14. Traffic and Transport**

The extension project of CBG will be a generator of changes in existing roads. If on one side, it will be perceived negatively as it will result to the obstruction of some tracks, it will sometimes new paths of communication. This increase in traffic and the provision of new opportunities will affect the flow of people and goods in all project areas.

### Destruction of village roads and isolation

The communication plan with the communities should enable to inform the people that will be affected by the operations that will be undertaken in their village territory in the short medium and long term.

In case of destruction of village tracks, CBG will develop alternative tracks or rehabilitate old existing tracks. Maintenance of those tracks will be provided for the benefit of affected villages.

CBG will proceed, in advance, to a consultation with impacted communities to identify what are the village roads used that could be impacted and to ensure that the solutions are known and accepted by the affected population.

Community complaints and concerns will be addressed by the grievance mechanism set up by CBG as part of the project.

The impacts related to the increased traffic are addressed in the Health & Safety section of communities.

### The Circulation of the Train

#### *Ore Train*

Although the presence of the railway can be a positive thing as a well-maintained artery, it represents a significant impediment for the population.

With the increase in expected production, thus multiplying the number of journeys made by train, CBG will have to assess the effectiveness of existing crossings on the rail network and help increase or improve them. Following consultations undertaken, CBG is committed to setting up a team to study the best scenarios for the development of gateways, which can even accommodate two wheels vehicle passing through.

### *Passenger Trains*

Passenger trains traffic conditions will be maintained by CBG. CBG is also committed to undertake a study on the number of users and their needs in order to adapt the flow of passenger train to their needs or to provide alternative solutions.

### Maritim traffic in the estuary

It will be important that the communication plan with the communities should enable to inform the people that will be affected by the operations that will be undertaken in the short medium and long term on their territory.

Especially during the work, but also after, CBG will suggest and will support the development of a code of circulation and a navigation plan in collaboration with organisations of fishermen and of transport of passengers to find traffic routes in the estuary of the Rio Nuñez suitable and secure in order to ensure the continuity of their activities.

Community complaints and concerns will be addressed by the grievance mechanism set up by CBG as part of the project.

#### **4.1.15. Cultural heritage and archeological sites**

During investigations in the area of Sangarédi when it was asked from interlocutors to name important places which they fear the destruction if their territory was taken by the extension of the mine project, they exclusively mentioned:

- The burial sites (berdhè);
- The residence sites of genies (höddho djinna / Souhoun djinna).

In addition to these sites, the study team conducted an archaeological survey of the surface areas of the mine extension linked to the capacity increase project of CBG.

CBG will manage cultural heritage by complying with IFC PS8.

### Cultural Heritage

The burial sites are divided into six subtypes:

- Current Cemetery;
- The old cemetery ;
- Elders Cemetery;
- Cemetery of Koranic scholars;
- Children's Cemetery;
- Tombs of the founders.

These places are places of memory for the people who are responsible for them.

Genie residences, occupies the overwhelming majority of the identified sites. They were divided into two subtypes:

- Frequented: with ritual practice;
- Except: no ritual practice.

Background studies have shown clearly that the land and its resources are a "heritage" common to these genies, to the men they have welcomed and to the miners. This confirms the degree of processing complexity (moving or destruction of the site) which the CBG must expect by wanting to occupy a territory.

### Archaeology

Archaeological surveys helped identify sites of greater or lesser importance within the mining concession. With the discoveries achieved as part of the missions we can highlight the archaeological potential of the expansion territory of CBG.

### **Approach**

#### Cultural Heritage

Research teams have conducted the identification and geolocation of all landmarks known in the study area, including the mining concession south of the Cogon River.

Once the location-based site, a buffer zone of 500 meters was determined around each. All sites including that buffer zone in future mining areas were assigned a level of importance in terms of their value, for a total 136 sites.

This evaluation resulted in the creation of individual listings summary including a ranking among three categories namely:

- Low importance;
- Average importance;
- Strong importance.

Of these sites, 22 were identified as unmovable (non-negotiable). For other potentially movable sites their importance is not indicative of the degree of difficulty of indestructibility or displacement. Regardless of the degree of importance, all of these sites will be managed according to the same structure is:

- Negotiation with the populations concerned and in particular with the site managers;
- Consultation with occult specialists to identify sacrifices to make;
- Identifying an alternative location for the site where to install genies in which the dead could be buried.

The main measure is to consider the cultural heritage sites identified in the background study in any new quarry or infrastructure development approach and work with affected communities to ensure that all sites have been identified in order to plan the protection, relocation or compensation for the destruction of the sites (usually this will be done as part of a RAP). CBG is committed to evaluating all the sites located within a radius of 500 meters from its operations and not to approach its operations. This assessment will lead to four conclusions:

- The site can not be destroyed;
- The site will be destroyed without being replaced;
- The site will be destroyed and replaced;
- The site will be moved.

### Archaeology

Archaeological surveys were conducted with the support of the villagers to facilitate information collection and the identification of potential sites.

A total of 16 sites of interest were located in the territory studied. In addition, a map of the caves and rock shelters was carried out. As a result, 29 potential archaeological sites are still present in the area of study.

The 16 sites that were the subject of systematic studies helped determine the degree of importance according to their identification, their location and conservation status:

- A (Important)
- B (Medium importance)
- C (low-zero importance)

The majority of sites were graded C. An outdoor site was awarded the A value and a cave, the value B. These sites, even those of great importance, do not constitute an obstacle to CBG production targets.

## 4.2 Mitigation undertakings for the Project

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
<b>A. Management framework, programs and plans</b>							
1. During the construction and operating phases of the Expansion Project, environment and social risks and impacts will be managed according to the HSEC Management System described in Section III herein. Within this management system, plans will be developed for specific aspects and activities, including all relevant measures identified in the ESIA.	✓	✓	✓	✓	✓	✓	✓
2. Management plans must: 2.1. identify objectives and targets; 2.2. identify risks; 2.3. clearly identify management measures; 2.4. state how the management measures will be implemented; 2.5. state when the management measures will be implemented; 2.6. assign the responsibilities and resources needed for implementation; 2.7. state the skills and training needed; 2.8. state the monitoring and control measures; and 2.9. state how the plan will be adapted to evolve over time according to changes and measurement results.	✓	✓	✓	✓	✓	✓	✓
3. All management plans will be prepared in consultation with the stakeholders, before the beginning of the operations in question.	✓	✓	✓	✓	✓	✓	✓
4. All management plans will be subject to regular review and updating during all Project phases, based on the results of the monitoring and control.	✓	✓	✓	✓	✓	✓	✓
<b>B. Air quality</b>							
5. During the detailed engineering and construction phases, engineering controls for atmospheric emissions as identified in the deliverables from the feasibility study will be developed and implemented in order to meet the first intermediate targets or IFC guidelines. 5.1. to opt for a rotary tumbling system for underground cars rather than aerial; 5.2. to equip the tumbler and the crusher with dust control systems; 5.3. to equip all transfer points (eg falls) with a dust control system; 5.4. the conveyors added as part of the project must be closed; 5.5. to equip the new rotating furnace with an air purifier, at least equivalent to that existing on current furnaces.	✓		✓		✓	✓	✓
6. CBG will lower contract specifications by 20% regarding Bunker C sulfur content.			✓				✓



Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
7. The new electrical generators will meet IFC criteria and will be built and operated so as not to increase gas and particle emissions to levels exceeding the first intermediate targets or IFC guidelines.	✓		✓		✓		✓
8. Atmospheric emissions (SO <sub>2</sub> , NO <sub>x</sub> , NO <sub>2</sub> ) and particle emissions (PM <sub>10</sub> , PM <sub>2.5</sub> ) will be measured during construction and operations by means of a station incorporating continuous weather data and installed just outside the industrial zone and the city of Kamsar. The station will be equipped with : 8.1. continuous particle counter (PM <sub>10</sub> , PM <sub>2.5</sub> ); 8.2. SO <sub>2</sub> UV fluorescence analyzer; 8.3. NO <sub>x</sub> chemiluminescence analyzer; 8.4. weather station integrating temperature, atmospheric pressure, speed and wind direction, and rainfall at a 10 minutes interval.		✓	✓				✓
9. Sampling campaigns will be conducted to quantify the concentrations of particles (PM <sub>10</sub> , PM <sub>2.5</sub> ) and gases (NO <sub>x</sub> , NO <sub>2</sub> ) around the mining operations in order to validate the atmospheric dispersion models. 9.1. Passive samplers will be used near mining areas to confirm the NO <sub>x</sub> /NO <sub>2</sub> results.		✓	✓		✓		
10. If moderate or severe impacts are anticipated or occur during construction or operations, CBG will study the application of additional control measures designed to reduce particle or gas emissions. Such measures include: 10.1. increasing the use of water-spray dust control; 10.2. increasing maintenance and cleaning around dust-producing areas; 10.3. enclosing emissions sources; 10.4. use of a fuel with lower sulfur content; 10.5. updating the air quality model to predict the effects of the new mitigation measures.		✓	✓		✓		✓
11. As part of the Long-Term Mining Plan FEL3, a feasibility study will be conducted on the use of higher-capacity road trains in order to reduce the number of road trains.	✓				✓		
12. CBG will finalize the feasibility study on using surface miners for sensitive areas near roads and villages.	✓				✓		
13. The Long-Term Mining Plan team will detail the results of the study on using conveyors to transport bauxite in sensitive areas.	✓				✓		
14. The maximum approach distance of 100 meters prescribed by the Mining Code for any exploration or operational structure will be respected.	✓	✓	✓		✓	✓	✓
15. During the drafting of the Long-Term Mining Plan (FEL3), mine roads will be optimized so as to remain as far away from villages as possible (target 1 km). 15.1. before the opening of a new plateau, a specific study will be conducted to validate the passage of new roads technically, environmentally and socially.	✓				✓		
16. Water spraying of mine roads will ensure 80% dust control.		✓	✓	✓	✓		

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
17. The following measures will be adopted to control dust emissions when heavy machinery is travelling along mine roads: 17.1. when technically possible, keep speed limits at 40 km/h in sensitive areas and within 1 km of villages and sensitive natural areas; 17.2. install speed limit signs.		✓	✓	✓	✓		
<b>C. Greenhouses gases</b>							
18. CBG will produce an annual GHG emissions report based on its report of fuel consumption in the previous year.			✓		✓	✓	✓
19. The Project will ensure implementation of an efficient preventive maintenance program including period calibration of dryers and scrubbers.			✓				✓
20. The project will ensure to maximize the number of cars that can be driven by the current locomotives. The addition of 10 more cars per train is envisaged. 21. CBG will make sure that all equipment, vehicles and locomotives are kept in good working order.		✓	✓	✓	✓	✓	✓
22. During the study phases, the Project tried to optimize vehicle and equipment movement to minimize travel and idling time.	✓	✓	✓		✓	✓	✓
23. Fuel consumption and performance will be taken into account when new equipment and vehicles are purchased.		✓	✓		✓	✓	✓
24. The Project includes a new on-board rail signaling system featuring an automated speed controller (22.5 MTPA) to reduce fuel consumption.	✓		✓			✓	
25. The Project is developing a paper source; a reclamation pilot project is under way, supported by CBG. It will reduce the impact of human activity on forests and mangroves, which are a CO <sub>2</sub> sink.	✓				✓		✓
26. CBG will revise its rehabilitation plan in order to compensate for lost years and ensure rapid restoration of cleared areas after extraction.	✓		✓	✓	✓		
<b>D. Noise and vibrations</b>							
27. The Project will draw up a plan for managing and monitoring noise and vibrations, including maps of sensitive areas identifying the mitigation measures to be implemented.	✓	✓	✓		✓	✓	✓
28. Specific noise criteria will be specified in the calls for tenders for equipment and material (e.g., "Low Noise" option). Machines must generate less than 85 dBA at a distance of 1 meter. Any equipment generating noise above that level must be enclosed.	✓	✓			✓		✓
29. CBG will ensure that all equipment, vehicles and locomotives are kept in good working order along with their noise reduction systems.		✓	✓	✓	✓	✓	✓
30. CBG will maintain all its roads so that they are free of potholes and other irregularities.		✓	✓	✓	✓		
31. The Project will study the feasibility / availability of white-noise reversing alarms on machinery.	✓	✓	✓	✓	✓		

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
32. CBG undertakes to respect the 100-m infrastructure approach limit prescribed by the Mining Code (500 meters in the case of blasting).		✓	✓		✓	✓	
33. CBG undertakes to implement mitigation measures when the noise levels produced by operations increase the baseline ambient sound level by more than 3 dBA or exceed the IFC guidelines; such measures include: 33.1. identifying zones in which more than one operating cell is authorized to operate; 33.2. ordering studies to ensure at-source noise reductions on mining equipment; 33.3. setting up a minimum 100-m zone between operations and dwellings; 33.4. creating planted embankments at the boundaries of mining plateaus; 33.5. organizing mining operations to start at the opposite end from the villages and work toward the villages; 33.6. planning night shifts to take place in non-sensitive areas, keeping the daytime operations for more sensitive areas. 33.7. to amend the mining operation plan so as to avoid areas where the impact could not be reduced in an acceptable manner.			✓	✓	✓		
34. CBG undertakes to ensure that all blasting will take place at fixed times as much as possible, and to inform nearby communities about the blasting schedule. 34.1. to avoid making too much noise during the night, early in the morning and at dusk; 34.2. to prohibit blasting operations between 16:00 and 9:00.			✓		✓		
35. The explosive charge mass per delay based on the actual source-receptor distance, in accordance with the charts in the ESIA (Chapter 2, Fig. 2-2, Fig. 2-3), will remain within the limits for ground vibration and blast overpressure. 36. To ensure that mining operations are undertaken in so as to limit noise in critical habitats, for example by starting to dig in the most remote part.			✓		✓		
37. The Project will finalize the feasibility study for the option of using surface miners for sensitive areas near road and villages.	✓		✓		✓		
<b>E. Water and sediment quality</b>							
38. CBG will update and improve its surface water quality-monitoring program, which is designed to assess the impact of its activities on the surrounding areas, including the measurement points retained in the ESIA. 38.1. to add a plan for monitoring groundwater; 38.2. to implement a monitoring program of main stream flows; 38.3. to add control points to the current sampling program of surface water; 38.4. add pH measurement on the list of parameters checked by the laboratory in surface water.	✓	✓	✓		✓	✓	✓
39. CBG will continue to apply its wastewater-monitoring program, designed to characterize wastewater and to identify sources of contamination and ways of reducing it.	✓	✓	✓		✓		✓
40. A green buffer of at least 50 meters will be maintained between watercourses and operation zones to prevent soil erosion.	✓	✓	✓		✓		✓

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
41. The mining plan provides for site restoration as soon as possible after the bauxite extraction is finished. This will include reusing the stripped-off topsoil to rehabilitate the areas mined.			✓	✓	✓		
42. CBG will carry out a river crossing plan through mining roads.							
<b>F. Soil</b>							
43. CBG will implement waste management practices designed to ensure safe handling and storage of all hazardous waste.		✓	✓	✓	✓	✓	✓
44. The Project undertakes to comply with all the requirements in CBG's hazardous materials management procedure to ensure that all potential sources of contamination are managed and controlled. Among other things:							
44.1. precautionary measures will be applied during the transport, handling and installation of equipment containing oil;		✓	✓	✓	✓	✓	✓
44.2. all hazardous materials (including oil and fuel) used in construction activities will be stored in tanks or in areas with effective retention systems (such as retention basins) to prevent environmentally harmful spills.							
45. Machinery will be inspected to avoid leaks and spills of hazardous materials (hydrocarbons, chemicals, etc.):							
45.1. a locomotive engine inspection program will be set up (general condition, leak detection, etc.) to prevent leaks and spills of hazardous materials (oil, coolant);							
45.2. spill control kits (including absorbents) will be kept on hand in locations where hazardous substances (including petroleum products) are handled;		✓	✓	✓	✓	✓	✓
45.3. maintenance of machinery and equipment will be done in CBG shops or in the field, using safe methods for recovering used machine oil. Used oil will be collected according to CBG's hazardous waste procedure and sent to tank THF4 to be incinerated in the bauxite dryers.							
46. Unless technically impossible, equipment and machinery will be fuelled at the fuelling station, which has a concrete surface and a no-spill nozzle.		✓	✓	✓	✓	✓	✓
47. Accumulation of waste of any type will be avoided; recycling of scrap metal and other recyclables will be advocated (scrap metal may be shipped by freighter to a recycling center outside the country); all final residue will be transported to the landfill.		✓	✓	✓	✓	✓	✓
48. Soil contaminated by construction activities or by a hydrocarbon spill will be sent to CBG's soil treatment plant.		✓	✓	✓	✓	✓	✓
49. Non-contaminated excavated soil will be disposed of in industrial zones.		✓	✓	✓	✓	✓	✓
50. Materials and equipment will be stored in an area or areas set up for that purpose in an industrial zone. Such areas will be fenced in and guarded by security personnel to prevent vandalism and theft, which could result in soil contamination.		✓	✓	✓	✓	✓	✓
51. CBG will keep a log and produce an annual report on the hazardous waste produced and where it is being stored or how it was disposed of.		✓	✓	✓	✓	✓	✓

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
<b>G. Biodiversity action plan</b>							
52. As part of the planning and operations, access to important biodiversity areas will be controlled and care will be taken, during land clearing, to leave natural corridors so as to avoid isolating patches of habitat.			✓		✓		
53. To reduce the impacts anticipated in the ESIA on important biodiversity areas, the Project will make sure:							
53.1. to set up a work permit system in sensitive areas such as critical habitats;							
53.2. not to carry out dragging operations between August and January;							
53.3. to clearly demarcate work areas by means of signs, barriers and fences;		✓	✓	✓	✓	✓	✓
53.4. to clearly demarcate the areas to be stripped and the areas where machinery may circulate, and to keep these to a minimum;		✓	✓	✓	✓	✓	✓
53.5. to prohibit workers and vehicles from circulating outside the work areas and access roads;							
53.6. to avoid work in lakes, rivers and streams or on shores and banks except where absolutely necessary;							
53.7. that an environment advisor is present during any work in or near a watercourse.							
54. Steps will be taken to protect important biological species in the Rio Nuñez Estuary:							
54.1. avoid the use of suction dredgers. If there is no alternative, a turtle deflector or other means must be used;							
54.2. reduce underwater noise to a minimum during dredging or quay construction;	✓	✓	✓				✓
54.3. set a speed limit of 18.5 km/h in the estuary and 11 km/h when less than 100 m from shore;							
54.4. ask ships to keep a straight course as much as possible, without tacking;							
54.5. avoid using ships without propeller guards during work.							
55. To reduce the risk of collisions, CBG will set a speed limit of 60 km/h for all vehicles on mine roads, and will enforce it rigorously.		✓	✓	✓	✓		
56. The Project undertakes to reduce and control lighting levels at its permanent and temporary facilities by taking the following steps:							
56.1. reduce lighting to the minimum needed for safety;							
56.2. whenever possible, use directional lighting to avoid lighting up non-essential areas such as the sky and outside the work area;	✓	✓	✓	✓	✓	✓	✓
56.3. use baffles to limit the lit area in highly sensitive zones;							
56.4. use timers or motion detectors wherever constant lighting is not necessary;							
56.5. wherever possible, use light towers that are low to the ground to reduce unnecessary lighting;							
56.6. do not over-illuminate indoor areas.							
57. The Project undertakes to implement measures to ensure that CBG uses good practices in vegetation clearing and soil stripping. These measures include:							
57.1. educating the personnel doing the stripping operations about the importance of protecting the removed soil;							
57.2. establishing a permit system for soil stripping;		✓	✓		✓	✓	✓
57.3. making sure an environmental advisor is present during soil stripping;							
57.4. taking steps to prevent accidental fires in the vegetation;							
57.5. prohibiting vegetation burning as part of the clearing operations;							
57.6. setting aside topsoil to be reused during site restoration;							

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
57.7. letting plants grow in the soil stockpiles to stabilize them and protect them against the wind; 57.8. avoiding the destruction of riverbank vegetation; 57.9. minimizing impacts on mangroves as much as possible; 57.10. taking the necessary steps to prevent erosion and stream contamination.							
58. CBG will set up an annual program for controlling nuisance and invasive species such as <i>Chromolaena</i> .		✓	✓		✓	✓	✓
59. The Project, in conjunction with the Environment Department, will review the mine site rehabilitation approach and will apply the following actions: 59.1. the Project undertakes to follow the Rio Tinto Closure Standard (March 2013); 59.2. review long-term rehabilitation objectives to make sure the SoC zone is closed before operations begin in the NoC zone; 59.3. zones no longer needed for operations will be rehabilitated as soon as possible in accordance with the closure plan for mined areas; 59.4. find local species during rehabilitation, use species that can contribute to the ecosystemic value of the habitat and avoid using foreign species.			✓		✓		
60. The Project will promote community use of biodiversity and other ecosystem services by: 60.1. prohibiting hunting and harvesting of natural products outside the work area by its employees and contractors; 60.2. offering wood from land clearing to nearby residents, at no charge.		✓	✓		✓	✓	✓
61. The Project will set up a training, information and awareness program for contractors and CBG personnel, as well as for communities, consisting in: 61.1. producing and distributing brochures explaining the importance of protecting animals in the estuary and ways of reducing problems; 61.2. training machinery operators to use only their low-beam headlamps and minimize the use of high beams; 61.3. incorporating education about environmental aspects in general and risks of collision in particular into the HSEC induction sessions.		✓	✓	✓	✓	✓	✓
62. The Project will keep a record of observations on biodiversity, which will include: 62.1. requiring personnel to notify the CBG Environment Superintendent of any collision with a large animal.							
63. The Project and CBG undertake to commission additional studies which the ESIA has identified as being necessary, specifically: 63.1. additional botanical studies prior to the opening of new mining areas; 63.2. studies to identify the potential presence of vulture nests (endangered species) prior to the opening of new mining areas; 63.3. a study on the lizard <i>Hemidactylus Kundaensis</i> as part of the Resettlement and Compensation Action Plan (RAP) for the Kourawel region; 63.4. optimization of the mine road network for the Long-Term Mining Plan in the detailed engineering phase; 63.5. a study to determine the sediment deposit zone (dredging).	✓		✓		✓		✓
64. During the detailed engineering phase, the Project undertakes to start development on a plan for protecting critical habitats (gallery forests, Cogon, Rio Nuñez) and natural habitat (Bowal):	✓	✓	✓		✓	✓	✓

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
64.1. establishing monitoring measures with biodiversity indicators in each critical habitat (Primates – Gallery forests   Hippopotamus – Cogan   Humpback dolphins – Rio Nuñez).							
<b>H. Social and demographic structure</b>							
65. To limit the numbers of young men leaving the villages in the mining concession, the Project and CBG will communicate with the villages, prior to the start of construction, about the scope and agenda of the mining plan and will organize consultations with potentially impacted villages in order to prepare for implementation of a RAP.			✓		✓		
66. Prior to the start of the Expansion Project, a local, regional and national communications plan and strategy will be developed to inform potential job-seekers about the actual job opportunities offered by the Expansion Project.	✓	✓			✓	✓	✓
67. Community support programs and projects will promote initiatives supporting agriculture and herding as a way of getting people to stay in the rural areas and limiting departures to the cities.	✓	✓	✓		✓		
68. CBG undertakes to support education and vocational training programs, with particular emphasis on education for girls.	✓	✓	✓		✓	✓	✓
69. CBG will develop a influx management plan.		✓	✓		✓		✓
70. The CBG Community Relations teams will track demographic changes in villages in the mining area, based on indicators developed during the ESIA socioeconomic baseline study.			✓		✓		
<b>I. Community safety</b>							
71. All CBG personnel and subcontractors' personnel operating vehicles will be trained in road safety:		✓	✓	✓	✓		✓
71.1. after investigation and analysis, CBG will assume the costs of human accidents involving CBG vehicles, including trains and the ships for which it is responsible.		✓	✓	✓	✓		✓
72. The Project will reinforce the program for tracking the number and severity of accidents in the mine, railroad and port zones and the preventive, corrective and compensatory measures implemented. This program is already in place for CBG operations.		✓	✓	✓	✓	✓	✓
73. The Project will implement and promote ways to ensure safe travel in the mining areas, in particular by:							
73.1. implementing a road traffic code specific to the areas being mined (near pits and along mine roads) and clarifying residents' rights to use the mine roads;		✓	✓	✓	✓		
73.2. reinforcing safety at intersections between mine roads and village roads;							
73.3. studying the construction of alternative safe routes along mine roads;							
73.4. where CBG operations block village roads, work with affected populations to plan, build and maintain alternative routes to enable people to travel to neighboring villages and urban centers.							
74. With the increase in the number of bauxite deliveries by train every day, the Project undertakes to implement the following measures:	✓	✓	✓			✓	
74.1. install a communications-based train control system (CBTC) during the 22.5 MTPA phase or later;							

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
74.2. begin a program of installing motors on rail switches; 74.3. continue raising public awareness about railroad safety by stepping up the “Gare au Train!” program in the railroad and mine zones, with emphasis on trains stopped along the tracks; 74.4. secure frequently used roads along the railroad tracks; 74.5. light the railroad tracks near certain villages; 74.6. reinforce safety at level crossings; 74.7. study pedestrian level crossings and overpasses along the railroad tracks.							
75. Working with the government and the port authority, the Project will help improve the signaling system in the channel with a view to improving safety for passengers and fishermen, in particular by: 75.1. sending a weekly update to the port authority (fishing port) on the work to be done in the following week; 75.2. transmitting a message on the status of maritime work and the precautions to be taken on Radio CBG; 75.3. multiplying the number of monitoring shuttles circulating in the channel to prevent accidents.		✓	✓				✓
<b>J. Community health</b>							
76. The Project will promote the prevention of communicable diseases, in particular HIV/AIDS and malaria, by: 76.1. requiring systematic screening for all expatriate workers (pre-employment medical); 76.2. including communicable diseases education in the HSEC induction sessions; 76.3. organizing workshops to raise awareness among CBG and contractors’ personnel; 76.4. organizing radio and TV information and awareness campaigns in villages; 76.5. distributing condoms to CBG personnel, including Expansion Project personnel; 76.6. controlling access to construction camps and prohibiting visitors.		✓	✓	✓	✓		✓
77. Working with the government and other mining companies operating in the area, CBG will: 77.1. support initiatives to improve access to basic infrastructure; 77.2. develop a partnership to improve infrastructure and access to public healthcare.		✓	✓	✓	✓		✓
<b>K. Infrastructure and basic services</b>							
78. In future Resettlement and Compensation Plans, the Project will implement prevention and compensation measures to ensure that education conditions for children and young people are not degraded but improved because of the Expansion Project.	✓	✓			✓		
79. CBG will support public-private partnerships (outsourcing of public services) for the provision of basic services (water and electricity) in Kamsar, Sangarédi and Boké.			✓		✓	✓	✓
80. CBG will promote and support any initiative to build and equip (in material and personnel) new health centers in the rural area of the concession as part of a community project.			✓		✓	✓	✓
81. CBG will contribute to the funding (with the government) of community projects to build basic infrastructure (water, electricity, schools) for the entire population of the Project area, in order to reduce inequalities of access to basic services.			✓		✓	✓	✓



Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
82. The Project will support the opening of the Boundou Wandé health center, funded by CBG.	✓				✓		
83. CBG will work with government departments (SNAPE) and local communities to establish a plan for developing safe water points in the cities of Kamsar and Sangarédi, in order to prevent degradation of, and even improve, conditions of access to water.			✓		✓		✓
84. CBG's Community Relations team will initiate a dialogue with local authorities and youth representatives in Kamsar and Sangarédi concerning the need for, and conditions of access to, recreational and cultural areas for young people and for the urban population at large.	✓	✓	✓		✓		✓
85. CBG will propose a study, in collaboration with ANAİM and the Ministry of Health, on fees to be paid by non-residents in health centers and hospitals managed by ANAİM and CBG in order to promote the principle of universal health care.			✓		✓		✓
<b>L. Economic environment and household strategy</b>							
86. The Project undertakes to observe the Mining Code with particular attention to Article 107, "Priority to Guinean Companies," Article 108 "Employment of Personnel," and Article 109 "Training of Personnel" (2011 Mining Code).	✓	✓	✓	✓	✓	✓	✓
87. CBG will reinforce its training program for young graduates: (translation) "The training and professional development plan will consist of taking in graduates from vocational schools and universities for professional training to last six (6) months and introduction to the company for students in training for a duration of two (2) months."	✓	✓	✓		✓	✓	✓
88. CBG will ensure an annual audit of Very Small Businesses (VSBs) in terms of HR management and salary policy.		✓	✓	✓	✓	✓	✓
89. The Project will guarantee good working conditions for subcontractor and VSB employees, incorporating labor standards as requirements in the Terms and Conditions and providing for remedies in the event of a breach of commitment.		✓	✓	✓	✓	✓	✓
90. CBG will maintain a centralized database containing the resumés of job candidates, accessible from several dedicated workstations and updated regularly, and will make the selection process mandatory.		✓	✓		✓	✓	✓
91. CBG will set up satellite information and hiring offices to inform job-seekers about opportunities:							
91.1. the Project will ensure broad communication of job opportunities and the skills and training required for each position (direct and contractual), in order to "democratize" access to employment.		✓	✓		✓		✓
92. The Project will support the creation of community projects and new VSBs or NGOs designed to generate new employment, with emphasis on areas that will eventually enable local populations to be less dependent on mining. Such initiatives include:							
92.1. projects to promote sanitation services in Sangarédi and Kamsar;							
92.2. revenue-generating initiatives (in collaboration with the Guinean government and national and international NGOs) such as agricultural training, local economic diversification (product processing, training in various trades according to identified needs);		✓	✓		✓		✓
92.3. in collaboration with the Guinean government and specialized NGOs, the Project will support the modernization of agricultural techniques in order to improve yields.							
93. CBG will set up a regular process for assessing and monitoring programs for restoring the means of subsistence. In particular:							
93.1. it undertakes to support the subsistence restoration programs, including training and the modernization of agricultural practices in the mining area, with particular attention to food processing and activities done by women, such as market gardens.			✓		✓	✓	✓

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
94. As part of the mining area rehabilitation plan, CBG will aim to rehabilitate the maximum number of areas cleared, or other areas as compensation, so as to limit the impacts on firewood harvesting and the charcoal production economy.			✓	✓	✓		
95. CBG will support the local fishing industry by investing in the modernization of port infrastructure as part of its community projects.			✓				✓
96. As part of the RAP, the Project will work with affected communities to develop a strategy for maximum protection of vital resources (springs, rivers, backwaters) and farmers' fields.	✓	✓	✓		✓	✓	
97. Management and the Environment Department will work to protect springs and watercourses used by rural populations.		✓	✓	✓	✓	✓	
<b>M. Access to land, resettlement and compensation</b>							
98. CBG will limit involuntary displacements as much as possible:	✓	✓	✓		✓	✓	✓
98.1. wherever possible, maintain a 500-meter buffer between inhabited areas and mine pits; if this is not possible, maintain the 100-meter protection zone prescribed in the Mining Code.							
99. CBG will conduct field checks prior to any work in "unoccupied" areas in order to ensure that no resettlements are necessary.	✓	✓	✓		✓	✓	✓
100. If a resettlement is unavoidable, CBG will develop and implement a RAP in accordance with IFC standards before the work starts. The RAP will:							
100.1. support the creation of inter-village committees to clarify property limits in preparation for the compensation process;							
100.2. replace any social infrastructure that will be destroyed, or whose mode of functioning will be altered by the Project;							
100.3. compensate for all lands (buildable or not) and infrastructure on the basis of a management plan for individual and collective compensations, and cover losses incurred by individuals (claimants) and the community;							
100.4. where lands are managed collectively, establish compensation for lost lands for the community as a whole so that it can maintain its standard of living by securing and diversifying its sources of revenue;							
100.5. when crops, fallow lands and/or pasturage are impacted by mining operations, ensure a compensation system that will enable people to maintain ongoing revenue sources;							
100.6. take into account not only the lands lost at the time of requisitioning, but also the loss of the right to land;	✓	✓	✓		✓	✓	✓
100.7. avoid creating jobs (even contractual ones) as a form of compensation;							
100.8. develop and adopt a strategy for continuous and transparent communication about displacement and resettlement;							
100.9. ensure that all people affected by involuntary resettlement, especially vulnerable groups, are included in all phases of the resettlement;							
100.10. clarify the status of landowners whose lands will be requisitioned for the Project;							
100.11. take into account the areas that will receive the displaced populations, and the impacts associated with the arrival of new residents in these substitute areas;							
100.12. respect the will of the affected populations regarding which area they will be relocated to;							

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
100.13.implement a follow-up, assessment and adaptation mechanism to monitor the actual economic benefits of projects initiated as compensation measures; 100.14.use the services of NGOs specializing in local development to implement and monitor development projects funded as part of the compensation; 100.15.set up a program, specifically adapted for each RAP, to address complaints and prevention and compensation measures, as well as remedial measures.							
<b>N. Governance and social</b>							
101. CBG will reinforce its communications policy by: 101.1. complementing it with a cooperation framework allowing open discussion with communities and technical departments (Sangarédi, Boké, Kamsar); 101.2. informing the public about the jobs created and the hiring conditions; 101.3. clarifying the services to be provided by CBG (water and power) throughout the Project area and communicating transparently on this subject.	✓	✓	✓		✓	✓	✓
102. When choosing which initiatives to finance as part of its community projects, CBG will take into account the local development plans (PDLs) developed by the communes.			✓		✓	✓	✓
103. The Project will set up a grievance mechanism that meets the IFC requirements.	✓	✓	✓	✓	✓	✓	✓
104. CBG undertakes to sign a Local Development Agreement as prescribed by the Mining Code (Article 130, 2011).	✓	✓	✓		✓	✓	✓
105. CBG will work with affected communities to draw up community development plans (PDCs) identifying actions to take in the medium term (as per Section V: Relations between the holder and the local communities, 2011 Mining Code).	✓	✓	✓		✓	✓	✓
106. CBG will work with affected communities to draw up community development plans (PDCs) identifying actions to take in the medium term (as per Section V: Relations between the holder and the local communities, 2011 Mining Code): 106.1. as part of the PDCs, CBG will decide on simple tools for conducting regular audits of the projects under way and an evaluation of completed projects.	✓	✓	✓		✓	✓	✓
<b>O. Communication and information</b>							
107. The Project will incorporate CBG's policy and strategy on local communications.	✓	✓	✓	✓	✓	✓	✓
108. The Project will organize information and progress report meetings on the ESIA in the six subprefectures initially visited.	✓				✓	✓	✓
109. CBG will support national, regional and local public information campaigns on its real contribution to the provision of social services.	✓	✓	✓		✓	✓	✓

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
<b>P. Traffic and transportation</b>							
110. Before the work begins, the Project will consult the affected communities to find out which village roads could be impacted and to make sure the people know and accept the solutions chosen and the resulting impacts. This also means:							
110.1. making sure alternative roads are available if mining operations have partially or completely destroyed the roads connecting villages to each other or to the urban centers;	✓	✓			✓		
110.2. clearly communicating the status of mine roads (in use, not in use, returning to use, etc.);							
110.3. making sure alternative roads are available if mining operations have partially or completely destroyed the roads connecting villages to each other or to the urban centers;							
110.4. regularly maintaining the alternative roads built for affected villages.							
111. The Project will study the possibility of setting up corridors that run immediately alongside mine roads, but are separated from them (by a material stockpile for example), when such corridors follow a route that corresponds to the villagers' needs.	✓	✓			✓		
112. The Project will set up an advisory committee to study the construction of overpasses for pedestrians, vehicles, livestock herds, etc. Representatives of villages affected by the railroad will sit on this committee:	✓	✓	✓			✓	
112.1. study the construction of overpasses according to the recommendations of the advisory committee.							
113. The Project will support a study on passenger train use:	✓	✓				✓	
113.1. CBG will adapt the passenger train schedule to the needs in the Project area, or will find alternative solutions.							
114. The Project will support the development of a navigation plan in collaboration with fishing and maritime passenger transport organizations, in order to find suitable and safe traffic routes in the Rio Nuñez Estuary:	✓	✓					✓
114.1. set up a specific maritime traffic code during the construction phase, with reinforced safety measures to protect passenger and fishing vessels.							
<b>Q. Cultural heritage and archaeological sites</b>							
115. The Project will draw up a plan for cultural heritage management and preventive archaeology, including actions to take for locations within the mining areas. This plan must cover all locations identified in the baseline studies and must adopt a systematic approach:	✓	✓	✓		✓	✓	
115.1. it must include a record of georeferenced sites which are not directly affected by the Project and where practices will not be disturbed.							
116. Wherever cultural heritage studies have not been conducted, CBG will determine the potential existence of sacred sites in areas that will have to be cordoned off by the Project during future inventories conducted as part of a RAP:		✓	✓		✓	✓	
116.1. "notify the government of any archaeological find and not move anything without the government's permission" [translation] (Halco agreement, 2001 amendment).							
117. The Project will support studies on the two Paleolithic sites (outdoor and cave):		✓			✓		
117.1. objects found at either site will be donated to a museum in agreement with the Management of the Musée National de Guinée following study of the objects and gathering of all data concerning them;							

Mitigation measures	Phase				Component		
	Design	Construction	Operations	Closure	Mine	Railroad	Plant/Port
117.2. participate in the publication of data in international scientific journals.							